

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

3 CASE NO.: 19-cv-17764 (AT) (KHP)

4 ARLENE DELGADO,

5 Plaintiff,

6 vs.

7 DONALD J. TRUMP FOR PRESIDENT, et al,

9 Defendants,

10 /-

12 LOCATION: Remote Audio-Video Communication

13 DATE: February 8, 2024

14 TIME: 10:00 a.m. - 2:05 p.m.

18 DEPOSITION OF REINCE PRIEBUS

20 Taken before Elena Robaina, Florida

21 Professional Reporter, Notary Public in and for the
22 State of Florida at Large, pursuant to Notice of
23 Taking Deposition filed in the above case.

1 APPEARANCES VIA ZOOM VIDEO CONFERENCE:

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9 I_N_D_E_X

10

11 EXAMINATIONS

12 REINCE PRIEBUS DIRECT
13 BY MS. DELGADO 4

14 EXHIBITS FOR IDENTIFICATION

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No Defense Exhibits marked.



1 QUESTION TO CERTIFY:

2 Page 58 Line 7-8:

3
4 Q. So what were your discussions with
5 Mr. Drieband and/or with Mr. McGahn?

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7 * * * * *

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(Pursuant to the stipulation of the parties, the oath to be administered by me here today will have the same force and effect as if it were given to the witness while he was physically present before me in the State of Florida and I were acting in my capacity as a Florida Notary.)

Thereupon:

REINCE PRIEBUS

was called as a witness and, having been first duly sworn, was examined and testified as follows:

THE WITNESS: I do.

DIRECT EXAMINATION

BY MS. DELGADO:

Q. Good morning, Mr. Priebus.

A. Good morning.

14 **Q.** My name is Arlene Delgado. As you know,
15 I'm the plaintiff in this matter, and I just wanted
16 to go over some ground rules that are standard in
17 any deposition. Have you been deposed before?

A. Not that I -- I don't think so.

19 **Q.** Okay. Well, they are pretty much the
20 same in all, but we'll go over them anyway.
21 Basically, we're going to go over questions and
22 answers. If you don't understand any question that
23 I pose, please, by all means, tell me and I'll try
24 to rephrase it.

If you need to take a break, restroom,

1 you need to make a call, want to go get some water,
2 by all means tell me. We're definitely going to
3 take one break when we're 90 minutes in, around
4 11:30, just to place a call to my son's school.
5 But any other bathroom breaks you need, whatever,
6 please feel free to speak up. And I think that's
7 it.

8 And you understand you're under oath and
9 you need to give truthful answers under penalty of
10 perjury? I assume that's clear.

11 **A.** Yes.

12 **Q.** Wonderful.

13 And if you could answer just as you did
14 right now, perfect, with a clear "yes" or "no" when
15 appropriate, when you wish to answer yes or no
16 versus uh-huh or uh-uh, just for the court
17 reporter. We should also try not to talk over each
18 other.

19 Also, if your attorney objects, let him
20 put his objection on the record. And then usually,
21 if appropriate, he will tell you, you can then
22 answer. But just for ease of the court reporter's
23 job, we all need to give each other time. So if I
24 interrupt you for any reason, also let me know so
25 that I don't do that.

1 MS. DELGADO: Okay. Mr. Blumetti, if
2 there's any other ground rule you wanted to put
3 in, I have no...

4 MR. BLUMETTI: Nothing from me. I'm
5 ready to start.

6 MS. DELGADO: Okay. Wonderful.

7 BY MS. DELGADO:

8 Q. Okay. So if you could please state your
9 name and address, Mr. Priebus.

10 A. Sure.

11 Official name Reinhold Richard Priebus
12 with [REDACTED]
13 [REDACTED]

14 Q. Wonderful.

15 And what is your current occupation and
16 place of employment, please?

17 A. I'm an attorney at a law firm by the
18 name of Michael Best and Friedrich.

19 Q. Does that firm do any work presently or
20 in the past seven years for the Donald Trump
21 campaign or any affiliates, family members, so
22 forth for Mr. Trump?

23 A. I think several years ago one of the
24 partners did some work for the Trump organization,
25 but that was many years ago.

1 **Q.** Okay. And is it correct -- I read this
2 somewhere, you can correct me if it's wrong, is it
3 correct that Mr. Trump nominated you back in 2020
4 for I believe it was some sort of fellowship role?
5 Could you tell me about that?

6 **A.** I served on the White House fellows
7 board for about a year and a half.

8 **Q.** And when was that?

9 **A.** It would have been around 2020 to 2021.

10 **Q.** Okay.

11 **A.** Wait.

12 **Q.** So you heard me --

13 **A.** It would have been 2020 to inauguration
14 of President Biden.

15 **Q.** Great. Wonderful. Okay.

16 So you remain on good terms with
17 President Trump even past your White House
18 departure in 2017; is that correct?

19 MR. BLUMETTI: Object to the form.

20 THE WITNESS: I would say that's true.

21 BY MS. DELGADO:

22 **Q.** Okay. And do you consider yourself a
23 current supporter of President Trump?

24 **A.** Yes.

25 **Q.** Okay. You're the host -- you're on the

1 hosting committee, right? You're the head of the
2 hosting committee for the Republican National
3 Convention in July; is that correct?

4 **A.** Yes.

5 **Q.** Okay. Wonderful.

6 And there's also been some chatter and
7 reports that you're considering running for office;
8 is that correct?

9 MR. BLUMETTI: Object to the form.

10 THE WITNESS: No.

11 BY MS. DELGADO:

12 **Q.** You are -- you currently have not had
13 any discussions now or in the past year or two with
14 anyone about potentially running for Republican
15 office?

16 MR. BLUMETTI: Objection to form.

17 BY MS. DELGADO:

18 **Q.** Okay. I'll rephrase it.

19 Have you had any discussions in the past
20 year or two with anyone about running for office?

21 **A.** There was some minor chatter about me
22 running for governor of Wisconsin, which lasted
23 about 15 minutes. That's about it.

24 **Q.** Why did it last only 15 minutes?

25 **A.** Because I'm --



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1 Q. Are you not --

2 A. Number one, I'm not interested; number
3 two, I don't live in Wisconsin and it wouldn't be
4 good timing.

5 Q. Do you have any interest in running for
6 any other type of office in another state, for
7 instance, or any type of Republican office?

8 A. Not at this time.

9 Q. If you were to have an interest at a
10 future point in time, would an endorsement from
11 Donald Trump be helpful?

12 MR. BLUMETTI: Form.

13 THE WITNESS: I think it depends on the
14 circumstances.

15 BY MS. DELGADO:

16 Q. What circumstances?

17 A. Well, I mean, it depends where you're
18 running. I mean, I don't have any plans of running
19 for office in the future, so what state are you
20 talking about? I don't know. I don't know. It
21 depends -- well, you know that. I mean, it depends
22 on where you're running. Sometimes it's great.
23 You know, sometimes it wouldn't be. It depends on
24 where you're at.

25 Q. Well, fair enough. Fair enough.



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1 Okay. Have you read over your
2 co-defendant Sean Spicer's deposition?

3 **A.** No.

4 **Q.** And Mr. Blumetti, who's here with us
5 today, the lawyer for the Trump campaign, is
6 clearly representing you in this matter. Have you
7 been charged for Mr. Blumetti's representation or
8 paid anything for that representation?

9 **A.** No.

10 **Q.** So to be clear, it's being done free of
11 charge to you?

12 **A.** Right.

13 **Q.** Okay. And why are you represented by
14 the lawyer for the Trump campaign free of charge if
15 you worked for the RNC?

16 **A.** I guess because my -- the work that I
17 was doing at that time was originally part of the
18 transition, the RNC, you know, and it was
19 determined that the campaign would cover it.

20 **Q.** When was that determined?

21 **A.** I couldn't tell you. Maybe four or five
22 years ago.

23 **Q.** So would it be accurate to say that
24 around the time this lawsuit was filed that is when
25 it was determined that your representation would be



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1 covered?

2 **A.** Yeah. I don't really know what and when
3 all those decisions were made or what the reasons
4 were for those decisions, but that's what was done.

5 **Q.** And that segues us nicely then into if
6 you could tell me a bit about your role in the
7 2015-2016 election, primaries and general.

8 **A.** Yeah, I was chairman of the Republican
9 National Committee at that time, so I was in charge
10 of obviously running the committee, raising money
11 for the committee, conducting the nomination
12 process, handling a debate schedule, organizing and
13 overseeing a field operation to get out the vote
14 effort for our party, and organizational work at
15 the national level for all activities involving the
16 Republican party.

17 **Q.** And would it be accurate to say,
18 thinking back on that primary, that it was a
19 particularly -- would you describe it -- would it
20 be accurate to describe it as a particularly
21 contentious primary among the GOP?

22 **A.** I would -- I would agree with that.

23 **Q.** Have you ever seen one before or after
24 as contentious?

25 **A.** Well, perhaps the Barack Obama-Hillary



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1 Clinton race that went to the end of June, you
2 know, 2008. You know, 2012 wasn't really a picnic,
3 I would say. So, you know, with Mitt Romney and
4 John McCain and Pawlenty and all the rest. So I
5 mean, we -- we've been building up to contentious
6 primaries I think in our party, but I would agree
7 that it was a contentious primary.

8 Q. In the others that you mentioned, had
9 you ever seen a primary that had so many in the
10 forefront of the Republican party? And by that I
11 mean well-known activists, well-known writers,
12 well-known politicians within the party who were
13 openly hostile to the frontrunner.

14 MR. BLUMETTI: Objection to form.

15 THE WITNESS: Maybe.

16 BY MS. DELGADO:

17 Q. Such as? Which one are you thinking?

18 A. I didn't understand. Are you ask --
19 what are you asking?

20 Q. I'll rephrase it. Absolutely, I'll
21 rephrase it. That was a long question.

22 Have you seen any other primary in which
23 there was such hostility towards the frontrunner,
24 who throughout most of the primary was Donald
25 Trump, within the GOP itself, including individuals

1 at the forefront of the GOP and well-known
2 individuals?

3 **A.** I thought the people running in 2016
4 treated -- they actually avoided confronting Donald
5 Trump for the most part until the very end and it
6 was too late.

7 **Q.** Right. I don't mean his fellow
8 candidates. I mean well-known writers, well-known
9 politicians who were not writing, activists. Had
10 you seen any other primary where there was such
11 hostility and opposition within the party itself to
12 what was throughout most of the primary the
13 frontrunner?

14 MR. BLUMETTI: Objection to form.

15 THE WITNESS: I would concede that there
16 was plenty of hostility from writers and others
17 that opposed Donald Trump.

18 BY MS. DELGADO:

19 **Q.** Okay. Fair enough.

20 Can you recall some especially since you
21 were in the thick of all this, can you recall some
22 big name or well-known writers, pundits, for
23 instance, Fox News pundits, activists who were
24 pro-Trump during the primary?

25 **A.** Fox News, I don't know, maybe Steve



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1 Moore, Kudlow, Sean Hannity, Lou Dobbs. I mean, I
2 think ultimately once he became the nominee it was
3 pretty positive.

4 **Q.** Uh-hmm. And when did you find out that
5 you would be chief of staff in the White House?

6 **A.** I believe it would have been like maybe
7 just before mid-November. I don't remember the
8 date, but it would have been maybe a week or ten
9 days after the actual election day.

10 **Q.** Okay. And could you describe the chief
11 of staff role for me?

12 **A.** Well, traditionally it would be the
13 person that assists the President in running the
14 White House, decision-making, the flow of
15 information, point of contact for the President.
16 That's how I would describe it.

17 **Q.** Would you agree that selection of White
18 House personnel, particularly senior White House
19 personnel, is one of the chief duties of the chief
20 of staff?

21 **A.** I think it's one of the -- I think it's
22 one of them. But it's not -- certainly not
23 everything that the chief of staff is responsible
24 for.

25 **Q.** Sure.



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1 And there's a book by Chris Whipple, I'm
2 not sure if you're familiar with it, it's called
3 "Big Gatekeepers," and it's about the White House
4 chief of staff role. It was written in 2017 while
5 you were chief of staff. And in the top one he
6 lists, among others, as you say, is, "Selecting
7 senior White House staffers." So you agree that
8 that's one -- not the only but one of the duties?

9 **A.** I think you have some influence in the
10 process.

11 **Q.** How long were you in the role?

12 **A.** Six months.

13 **Q.** And I know it will be hard to remember
14 everyone, so I'm not asking you to list everyone,
15 but off the top of your head, can you give me the
16 names of some of the individuals you did select for
17 hiring?

18 MR. BLUMETTI: Objection to form.

19 THE WITNESS: I would say my immediate
20 staff around me I had, for the most part, it was
21 a decision made by the transition team, and
22 whoever was in particular departments that chose
23 their staff.

24 And, of course, I was -- my co-equal was
25 Steve Bannon as well, so I didn't -- I didn't

1 have the role of a traditional chief of staff as
2 you know.

3 BY MS. DELGADO:

4 Q. What do you mean by "as you know"?

5 A. Well, I mean, you -- I'm certain that I
6 think a lot of people saw that when I was named
7 chief of staff, I was named as a co-equal with
8 Steve Bannon, which was fairly unusual.

9 Q. And you stated earlier that you hired
10 those around you. Do you remember those names, at
11 least some of them?

12 MR. BLUMETTI: Objection, form.

13 THE WITNESS: Yeah, like my immediate
14 assistant Mallory Hunter, another assistant of
15 mine by the name of Mike Ambrosini. The two
16 people that worked right outside of my office, I
17 would say every -- the others were sort of group
18 decisions that were made.

19 BY MS. DELGADO:

20 Q. When you say "group decisions that were
21 made," who was in that group making the decisions?

22 A. Well, I mean, there are a lot of people
23 involved in the transition when decisions on hiring
24 were being made in pretty large meetings that we
25 would have during the transition. Mike Pence was

1 the chair of the transition. Steve Bannon
2 obviously was involved in the transition. Jared
3 Kushner was involved in the transition. Marc Short
4 was involved in the transition.

5 I can't remember everyone, but there's
6 probably ten to 12. Rick Dearborn, Bill Hagerty.
7 It was a big group of people.

8 **Q.** And as incoming chief of staff, given
9 that you would have been named chief of staff, as
10 you referenced earlier, by that point, are you
11 saying your ability to select someone for hiring
12 was the same as that of say Rick Dearborn?

13 **A.** Rick Dearborn had a very big role on who
14 the personnel were going to be during the
15 transition. Like he was sort of functioning as
16 a -- I don't remember his role, quite frankly, but
17 if I had to describe it, I'd say like an executive
18 director of the transition.

19 **Q.** And you mentioned Jared Kushner or your
20 co-defendant Sean mentioned his name specifically
21 and said he was involved a great deal in hiring
22 decisions. Would you agree with that?

23 MR. BLUMETTI: Object to form.

24 THE WITNESS: Yeah, he had a big voice
25 in decisions like that, I would say.



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1 BY MS. DELGADO:

2 Q. Was there a particular person of either
3 Rick or Jared or the ones coming to mind in this
4 group that maybe focused more on West Wing jobs
5 versus general administration and agency jobs?

6 A. I would say that the -- sort of the
7 heads of big departments were in charge of deciding
8 who was going to work in their departments, and for
9 the most part, it was -- I would say it was pretty
10 well siloed that way.

11 Q. Are there a lot of departments, for
12 instance, policy jobs -- I see what you mean in
13 terms of that might be easy to peg for press or
14 comms, but what about policy jobs or individuals
15 who had titles such as special assistant to the
16 President, is there a head of that?

17 A. No, I would say, for example, to make it
18 easy to describe, like, you know, if Don McGahn --
19 you know, I'm -- I would be more involved in
20 bringing options to the President, for example, of
21 who would be White House counsel, you know, the
22 very top job.

23 And we would bring options to the
24 President, he'd interview those options. Folks
25 would potentially tell the President what they --

1 you know, how they viewed the candidates. And then
2 the President would make a decision.

3 And then someone like Don McGahn would
4 fill out his, you know, his team and say here's
5 the -- here are the people we need in order for me
6 to fulfill my team. And I would say that would be
7 the way it would have been in every department.

8 So like in policy, you know, Gary Cohn,
9 you know, when we were trying to figure out who
10 would be the head of NEC, we bring in some options
11 to the President, the President makes a decision,
12 Gary Cohn brings in who he wants. Stephen Miller
13 at DPC brings in who he wants. Sean Spicer brings
14 in who he wants. And Jared and Ivanka brought in
15 who they wanted.

16 So it wasn't -- there was
17 decision-making more at the top and then from there
18 the slots got filled. And we were, as you may have
19 read, fairly behind. So I would say that, you
20 know, the focus was really at the top cabinet, top
21 White House spots, getting things put together and
22 getting ready for January '20.

23 Q. Why were you fairly behind?

24 A. Well, I think when the transition came
25 about, Chris Christie was in charge of the

1 transition, Chris Christie got relieved of his
2 duties, and I would say that we started pretty well
3 from scratch.

4 Q. Would it be accurate to say part of that
5 was because there was little belief, particularly
6 among the RNC, that Trump would win?

7 A. No.

8 Q. Let's go back, if I may circle back. I
9 jotted down some of the names you mentioned to
10 those you hired. You mentioned Mallory Hunter,
11 Mike Ambrosini, and, quote, two people right
12 outside of my office. Can you talk to me about the
13 qualification for Mallory, Mike, and the two
14 individuals outside your office, please?

15 A. They worked for me for several years at
16 the RNC, and Mallory headed up my fund raising and
17 events and some scheduling matters, and Mike
18 Ambrosini was my personal assistant for probably
19 four years before then.

20 Q. Would Ms. Hunter be working on fund
21 raising at the White House?

22 A. No. I just gotten to know her, and she
23 and I spent a lot of time together, and I needed
24 someone to help keep me organized in my role as
25 chief of staff, and that's what she did outside of



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1 my office.

2 Q. And you also hired Katie Walsh, correct?

3 A. Well, I didn't -- it wasn't just my
4 decision. Obviously, I had to talk to the group
5 about it, and particularly Jared and Steve. And
6 Steve had been working with Katie for a couple
7 months before the transition, and, of course, I had
8 to talk to the President about it as well.

9 Q. Why did you have to talk about that
10 selection and not say Mallory and Mike's?

11 A. Because it was a much bigger role. I
12 mean, deputy chief of staff of the White House is
13 a -- is a role that is -- you know, was sort of the
14 number two of the White House staff, and it's not
15 something I could just declare to be done without
16 making sure that everybody agreed with it.

17 Q. And Katie Walsh, if I recall correctly,
18 was a fund raising director at the RNC during the
19 elections?

20 A. She was chief of staff of the RNC.

21 Q. Also in charge of fund raising?

22 A. Two years before she was chief of staff
23 she was director of fund raising at the RNC.

24 Q. Were you aware of the discussions and
25 reports and concerns about Ms. Walsh not being

1 particularly supportive of the then president but
2 at the time candidate Mr. Trump during the
3 primaries?

4 **A.** I don't know if there were those -- I
5 don't know if there were such reports of that.

6 **Q.** Did you ever hear any discussions or
7 concerns raised about that?

8 **A.** Not during the primaries, no.

9 **Q.** No, once Mr. Trump won and subsequent to
10 Mr. Trump winning, did you hear any concerns about
11 Katie Walsh not having been particularly supportive
12 of the President as a candidate or as a person
13 during the primaries?

14 **A.** No.

15 **Q.** And how long was she at the White House?

16 **A.** Three months.

17 **Q.** Why only three months?

18 **A.** She just decided that she couldn't --
19 she didn't -- she didn't particularly like the
20 setup in the White House and didn't feel like it
21 was effective. Didn't think that she felt like she
22 was effective and was a lot of stress, and she
23 decided to leave, is my best recollection.

24 **Q.** Were you aware of reports that she was
25 asked to leave or left due to allegations of

1 leaking to the press?

2 **A.** I was aware of blog posts that made that
3 accusation. I was -- I'm aware of those blog
4 posts, yes.

5 **Q.** We can -- so you're saying there were
6 only blog posts, not -- what do you consider a
7 blog? I'm sorry.

8 **A.** I don't -- I don't know what they were.
9 I mean, they were reports. I don't know what kind
10 of reports. I certainly know there was some blog
11 reports that said that, yes.

12 **Q.** Do you consider, for instance, Politico,
13 a blog?

14 **A.** No.

15 **Q.** Okay. So I might have an exhibit or two
16 to show you about that, but we'll circle back. I'm
17 trying to not do the dual devices just yet.

18 And when Katie left after only three
19 months at the White House, I believe she went to
20 the (c) (4), correct, of the America First P.A.C.T.;
21 is that correct?

22 **A.** I believe so. I think that's what was
23 reported. I don't really know a hundred percent.

24 **Q.** And she was a top position at the
25 P.A.C.T., if I recall; is that correct?

1 **A.** I don't know.

2 **Q.** Okay.

3 **A.** It could be. You might be right. I
4 just don't remember. It was something in the
5 P.A.C.T.. I just don't know what it was.

6 **Q.** And would you say that's a position that
7 was facilitated by the fact that she served in the
8 White House; is that correct?

9 MR. BLUMETTI: Objection to form.

10 THE WITNESS: It may have not been the
11 White House. It may have been that she was
12 chief of staff of the RNC. It may have been
13 because some people liked the work she did and
14 wanted her to be involved. I don't know who or
15 why or what the reasoning was for all of that
16 other than I believe you're right, she would go
17 to them in some position.

18 BY MS. DELGADO:

19 **Q.** Did anyone go from the RNC, that you can
20 think of, to the P.A.C.T.?

21 **A.** I don't remember. I'm sure there were,
22 but I don't remember.

23 **Q.** Okay. Let's talk some more about the
24 hiring situation. Would you agree that there was a
25 girth or a scarcity of suitable candidates given

1 the amount of opposition that Mr. Trump had
2 received within well known individuals in the GOP?

3 MR. BLUMETTI: Objection to form.

4 THE WITNESS: I would say no. I'd say
5 the opposite. I thought that there were --
6 there was no shortage from my standpoint.

7 BY MS. DELGADO:

8 Q. Who is Rob Porter?

9 A. Rob Porter was the staff secretary who
10 came from Senator Hatch's office.

11 Q. Okay. And who made the decision to hire
12 him?

13 A. I don't remember.

14 Q. Did Mr. Trump have a say in most of the
15 West Wing hires?

16 MR. BLUMETTI: Form.

17 THE WITNESS: I would say that the big
18 West Wing hires, yes.

19 BY MS. DELGADO:

20 Q. And I'm sorry, if you could clarify what
21 you mean by "big." Do you mean senior level roles,
22 deputy assistant, et cetera, and not so much
23 administrative?

24 A. I'd say -- sorry. I'd say generally on
25 the main department heads, yes, and occasional



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1 folks that may not be department heads but people
2 that for whatever reason had his ear and he made it
3 known that there were a couple people that he -- he
4 advocated for.

5 **Q.** Who are those; do you recall?

6 **A.** Which ones?

7 **Q.** When you say that "he advocated for,"
8 people he advocated for.

9 **A.** You mean outside of the department
10 heads?

11 **Q.** Correct.

12 **A.** Let me see two and -- Omarosa was one
13 and Rudy Giuliani's son was one that wouldn't be
14 department heads, but he chimed in on it. I don't
15 remember all these things. You know, you have to
16 understand this is like eight years ago.

17 **Q.** Of course.

18 **A.** And I do a thousand things, but that's
19 the general gist of it.

20 **Q.** And what would be the reason for
21 Mr. Trump or did Mr. Trump give a reason or do you
22 have an opinion as to the reason that he pushed for
23 Omarosa to be hired?

24 **A.** I don't remember. I don't know.

25 **Q.** From your vantage point, what were



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1 Omarosa's qualifications for a White House job?

2 **A.** Outward facing, outgoing. I don't
3 really know her that well, so I couldn't tell you.

4 **Q.** Yeah, and I'm sorry, I don't mean
5 personality-wise. I mean, given her background,
6 her career, what were her qualifications? Because
7 she's a celebrity, so I assume you know something
8 about her. If I may ask, based on what you knew of
9 her career, when you heard she was appointed, what
10 would be her qualifications?

11 MR. BLUMETTI: Object to form.

12 THE WITNESS: She was at the time a
13 personal friend of the President. She had, you
14 know, history apparently from being on The
15 Apprentice with him and other events, and that
16 was the extent that I knew.

17 BY MS. DELGADO:

18 **Q.** And Rudy's son, same question.

19 **A.** Apparently going to be involved in
20 outreach through Office of Public Liaison and
21 working with groups around the country, and he'd
22 focus on a lot of sports groups and sporting and
23 schools in regard to sports, which was his
24 background. And it was a person that I can
25 remember that the President mentioned to me.

1 Q. Right. And I'm sorry, I didn't -- if I
2 wasn't clear, I wasn't asking what his role was
3 going to be.

4 What were his qualifications? Because I
5 assume given that you said you had so many great
6 applicants, I assume, for outreach, for sports, or
7 what you just mentioned, you could have many
8 different candidates. So what were Rudy's son's
9 qualifications?

10 MR. BLUMETTI: Objection.

11 BY MS. DELGADO:

12 Q. Okay.

13 A. I don't know. I mean, I didn't -- I
14 didn't personally hire any -- either of these
15 people. It was just -- you asked me when do I
16 remember the President chiming in on particular
17 people and those are two particular people I
18 remember and, of course, the department heads.

19 Q. Right.

20 And the question was, from your vantage
21 point, being chief of staff, what, in your opinion,
22 were their qualifications? But I think you
23 answered that you don't know what their
24 qualifications were.

25 A. Well, the qualifications would be,

1 there's a role that they -- that was going to be
2 filled, and they were going to fill it, and they
3 had qualifications to fill it.

4 **Q.** What were those qualifications?

5 **A.** I just told you.

6 **Q.** I don't think I heard them for Rudy's
7 son. I think for Omarosa you mentioned she was,
8 quote, outward facing and outgoing and a personal
9 friend of the President. And for Rudy's son, I
10 believe you spoke about what his role would be, but
11 what were his qualifications to work in the White
12 House?

13 **A.** I don't remember. It was eight years
14 ago. I just don't remember what they were.

15 **Q.** That's fine. Fair enough.

16 And -- and do you recall -- and I can
17 flash it up on the screen or if it's okay, I can
18 just quote it -- there was a Washington Post
19 article in August of 2018 where Mr. Trump is
20 discussing Jeff Sessions, who by then had departed
21 from his attorney general role, and Mr. Trump says,
22 "The only reason I gave him the job was because I
23 felt loyalty. He was an original supporter."

24 Will you agree that loyalty and being a
25 supporter based on that quote was a big

1 qualification for a White House job?

2 MR. BLUMETTI: Objection to form.

3 THE WITNESS: In some cases.

4 BY MS. DELGADO:

5 Q. In some cases.

6 Do you recall when Jeff Sessions came
7 out in favor of Donald Trump?

8 A. I don't remember when. I know he was
9 early and one of the first senators to do that.

10 Q. Okay. I can throw it up on the screen,
11 make it easier. Let me just throw it up on the
12 screen here. Let's see. In the chat, if everybody
13 can see the chat.

14 (Sharing screen.)

15 BY MS. DELGADO:

16 Q. Okay. I placed in the chat, if you
17 could see it, Mr. Priebus, an article I wrote
18 advocating for Mr. Trump.

19 Can you tell me the date on that
20 article?

21 A. I can't see it.

22 Q. Okay. Are you able to see the chat?

23 A. No.

24 Q. Okay.

25 A. It was up there, but -- the link was up



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1 there for a second, but it's gone now.

2 Q. Okay. All right. I'm resending it.

3 A. I see the link, but I don't see anything
4 else.

5 Q. Are you able to click on the link?

6 A. It's not there anymore.

7 (Off-the-record discussion.)

8 BY MS. DELGADO:

9 Q. Let me put it up on my screen and then
10 I'm going to share the screen.

11 (Sharing screen.)

12 BY MS. DELGADO:

13 Q. So I wrote, entitled, "20 Reasons Why It
14 Should Be Donald Trump in 2016."

15 A. I believe you.

16 Q. Okay.

17 A. I mean, I believe you. I mean...

18 Q. Okay.

19 MS. DELGADO: If not, Mr. Blumetti, you
20 can let me know if you object to my
21 representation of this article, and the date is
22 October 22nd, 2015.

23 A. Okay.

24 Q. Would you say that's an early supporter?

25 MR. BLUMETTI: Objection to form.



1 THE WITNESS: October of 2015?

2 BY MS. DELGADO:

3 Q. Yes.

4 A. I don't know.

5 Q. Would it help if I showed you -- since
6 you said Jeff Sessions was, would it help if I
7 showed you when Jeff Sessions endorsed Mr. Trump?

8 A. So you can just tell me or remind me.

9 It's just as easy.

10 Q. Okay. It was in February of 2016.

11 A. Okay.

12 Q. So do you consider October 2015 an early
13 supporter --

14 A. Well, I mean, I think -- I think it's
15 totally different. I mean, I think Jeff Sessions
16 is a United States senator. It's a primary.
17 There's hesitation among elected officials whether
18 to endorse or not, but I do think the President had
19 a lot of staff during the fall of 2015 on his
20 campaign. So, you know, I think it's just a -- I
21 think they are a little bit different.

22 But I haven't compared, you know, a
23 timeline as far as all the different people
24 involved and when they came out. I don't
25 particularly object to your statement, but as to



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1 who was early and compared to everyone else, I
2 don't know. I just never studied it.

3 Q. Do you know if the White House hired
4 anyone who was pregnant at the time?

5 A. I have no idea. Wait, wait --

6 Q. So --

7 A. Wait, wait. When are you -- sorry.
8 What timeline are you asking about?

9 Q. From the time Mr. Trump won the election
10 to inauguration or even through your tenure in
11 July 2017. So from November 2016 after Trump won
12 to July 2017, are you aware of any individual, any
13 woman who was pregnant who was hired?

14 A. I wouldn't know who was -- I wouldn't
15 know. I mean, that's not something I would ask. I
16 mean, I just wouldn't think about it.

17 Q. Right.

18 Just to be clear, my question isn't did
19 the White House hire anyone, because I know you
20 wouldn't necessarily know.

21 A. Okay.

22 Q. It's, are you aware of any?

23 A. I can't remember. I don't -- I'm not
24 aware of it as I sit here now. But I don't
25 remember what I knew eight years ago.

1 **Q.** So as you sit here now, you can't recall
2 anyone who was pregnant and hired?

3 **A.** Not that I knew of.

4 **Q.** I'm sorry. Go ahead.

5 **A.** Not that -- not that I knew of, but I
6 don't remember everything I knew then as I sit here
7 now.

8 **Q.** Sure. Fair enough.

9 Okay. And by the way, if I look down
10 while you're answering, I am paying attention to
11 your answers. I don't mean just to come across as
12 disrespectful, I'm just taking notes while you give
13 your answers, so please don't take any offense if
14 I'm not looking at the screen.

15 **A.** No problem.

16 **Q.** So -- and if I jump around from topic to
17 topic, also please excuse me. It's not deliberate.
18 It's just the way my mind works.

19 **A.** Understood.

20 **Q.** Okay. So there is a deposition
21 transcript that I wanted to show you, but Zoom is
22 such a tricky fellow, we might have to come back to
23 that. I'll show the excerpt later. But if
24 Mr. Blumetti has no objection, I can just read off
25 it.

1 MS. DELGADO: It was produced in
2 production, Mr. Blumetti. I'm referencing
3 Mr. Miller's deposition from December 1st, 2017.
4 Do you have any objection to my just reading off
5 of it?

6 MR. BLUMETTI: Are you able to share the
7 screen so the witness could see it?

8 MS. DELGADO: Yeah. I'm trying, and for
9 some reason that other one...

10 If you want to grab some water now while
11 I figure this out, feel free. Maybe we could
12 take a quick break for technical difficulties.

13 THE WITNESS: No problem.

14 MS. DELGADO: Okay. Okay. I want to
15 make sure I'm able to show it to Mr. Priebus
16 while I ask.

17 (Off the record.)

18 MS. DELGADO: Back on the record.

19 (Sharing screen.)

20 BY MS. DELGADO:

21 Q. Okay. Back on the record. Okay.
22 Mr. Priebus, so what I'm showing here is a
23 deposition that Jason Miller gave in 2017, so just
24 a few months after the time period we're discussing
25 in this case. And I'd like for you to read for



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1 yourself or I can read aloud and you can follow
2 along where it starts line 2, "So since..." Do you
3 see that?

4 **A.** Yes.

5 **Q.** Okay. So I'm just going to read it into
6 the record. So that's Miller speaking and he says,
7 "So since there still seemed to be some interest
8 from her end in possibly doing the White House, I
9 made sure that the draft org chart at least existed
10 up until I was removed from decision making, that
11 she was on there and had a spot."

12 And then further down he says (as read):
13 I spoke with -- I mean, there were a couple of
14 folks who kind of -- I don't know if counterpart is
15 the proper phrasing, but the other kind of
16 co-leader of the communications team who then ended
17 up going into the White House, Sean Spicer, he was
18 the other person, I guess the decision making
19 person, who I discussed it with. And then after I
20 basically had all the decision making removed from
21 me, that fell to him. End of quotation.

22 Is that accurate? Did I read that
23 correctly?

24 **A.** Yes. Okay.

25 **Q.** So Jason Miller represented that I was



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1 on the org chart at the time he was removed from
2 decision making.

3 When was I removed?

4 MR. BLUMETTI: Form.

5 THE WITNESS: I don't know if you were
6 on the org chart or not. I never saw that org
7 chart or I never saw the org chart, and if I
8 did, I didn't study it, and I'm not quite sure
9 what chart he's referring to in that deposition.

10 I don't know what chart he's talking about.

11 BY MS. DELGADO:

12 Q. Well, earlier you testified that the
13 head of each group -- and Mr. Miller had been named
14 comms director or was in the running at the time he
15 would have put in this org chart for such. Earlier
16 you testified that certain department heads would
17 put together their teams and bring in those names.
18 It sounded like what you were describing was an org
19 chart, no?

20 MR. BLUMETTI: Objection to form.

21 THE WITNESS: No, I just said that the
22 head of the department was in charge of putting
23 together their team.

24 BY MS. DELGADO:

25 Q. And wouldn't they put together what



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1 looks like or resembles or approximates an org
2 chart?

3 MR. BLUMETTI: Objection to form.

4 THE WITNESS: They may.

5 BY MS. DELGADO:

6 Q. So it sounds like Mr. Miller did,
7 correct?

8 MR. BLUMETTI: Objection to form.

9 THE WITNESS: Well, I don't know what he
10 did or didn't do. I can only agree that you
11 read the deposition accurately.

12 BY MS. DELGADO:

13 Q. Do you have any reason to believe or any
14 information that gives reason to believe that
15 Mr. Miller would lie under oath about this?

16 MR. BLUMETTI: Objection to form.

17 THE WITNESS: I don't think he would lie
18 under oath, but I don't -- I don't know what
19 people do or don't do, and I don't know whether
20 you were on an org chart or not, or I just can't
21 speak to that particular issue.

22 BY MS. DELGADO:

23 Q. Did you ever see my name on any list?

24 A. I don't remember seeing your name on any
25 lists.



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1 **Q.** Okay. And there's another e-mail, oh,
2 no, another exhibit here, which is an e-mail that
3 was also produced. And so I'm going to quickly
4 e-mail that to the court reporter so that she can
5 please share it on her screen.

6 If you could bear with me for
7 30 seconds. Okay. I sent that over. There you
8 go. Wonderful.

9 (Sharing screen.)

10 BY MS. DELGADO:

11 **Q.** Okay. Mr. Priebus, can you see that
12 e-mail?

13 **A.** Yes.

14 **Q.** Okay. And the date on that is
15 December 8th, 2016, correct?

16 **A.** Yes.

17 **Q.** Okay. And in it Jason Miller appears to
18 be recapping a meeting he had with you earlier that
19 day. And he says, and I quote, He, that means you
20 Mr. Priebus, "came and sat next to me on the plane
21 and said everyone from the comms shop was going
22 into the White House and I had final say over the
23 org chart and he wanted to sit down to review it
24 next week, unquote.

25 Do you remember that conversation?



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1 **A.** No.

2 **Q.** Do you have any reason to believe
3 Mr. Miller would have made it up?

4 **A.** I don't -- I don't -- I don't know if he
5 made it up or not, but I don't know if I would have
6 said something like that, that every single person
7 is getting a job. But I don't remember it.
8 Because I didn't have -- I couldn't have guaranteed
9 everybody a job. I didn't do that anywhere.

10 **Q.** And he references again the same term,
11 he says "the org chart." Does that help you
12 refresh your recollection of discussions of org
13 charts?

14 **A.** No.

15 **Q.** Did you see any org chart for anyone?

16 **A.** I saw -- I saw some org charts. I don't
17 remember what departments they were or if it was an
18 org chart of the overall White House structure that
19 we used to get a basic understanding of the main
20 department heads and jobs that were available in
21 each of the departments.

22 I mean, there were -- I do remember some
23 org charts or, you know, I would say during the
24 transition there would have been org charts of
25 different cabinets, org charts of the White House,

1 and org charts of different departments. But as
2 far as names and details, that, I don't remember
3 seeing.

4 Q. And in that e-mail he says that you
5 wanted to sit down to review it next week. So does
6 that not go to what you just said, that you weren't
7 necessarily saying everyone had a job but that you
8 would review it with him? Is that not consistent
9 then with your belief of what you would have said?

10 MR. BLUMETTI: Form.

11 THE WITNESS: I don't know in particular
12 because I don't remember the conversation, but
13 updating, you know, the e-mail says that I was
14 going to sit down with Jason and update him on
15 White House structure, perhaps that happened. I
16 don't know if it actually did or not.

17 And then as far as the e-mail from him
18 to you, you know, the one thing I think I could
19 have reiterated is that department heads are
20 going to have to say over who is in their
21 department and their own employees.

22 So I don't think that that's
23 inconsistent. The department heads would have
24 the -- would have the say over who was in their
25 department.



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1 MR. BLUMETTI: What's the Bates stamp
2 number on the exhibit, Madam Reporter?

3 MS. DELGADO: I'm not showing the Bates
4 stamp one. I don't think I am, but it is in
5 the -- in the Bates stamp, being the production.

6 MR. BLUMETTI: Okay. If we could, I
7 would just refer to Bates stamp exhibits if we
8 can to keep the record clean.

9 MS. DELGADO: The PDF extraction I was
10 going to show, the Bates stamp one made that
11 quite difficult, but I can -- I don't think the
12 others are part of the production, in any event.

13 THE STENOGRAPHER: And is this going to
14 be made an Exhibit 2?

15 MS. DELGADO: Sure. Yeah.

16 THE STENOGRAPHER: How about what you
17 read to him earlier, no, or would that also be?

18 MS. DELGADO: Yes, it would also be.

19 THE STENOGRAPHER: All right. So that
20 one would be 1 and then this one will be 2 then.

21 (Thereupon, Plaintiff's Exhibit No. 1
22 was marked for identification.)

23 (Thereupon, Plaintiff's Exhibit No. 2
24 was marked for identification.)

25 MS. DELGADO: And this one will be 2,



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1 yes. Thank you.

2 THE STENOGRAPHER: Do you want me to
3 stop share?

4 MS. DELGADO: Oh, yes. Thank you.

5 THE STENOGRAPHER: All right.

6 BY MS. DELGADO:

7 Q. So who -- when you referenced final say
8 and the e-mail references final say, so who did
9 have final say over comms and press?

10 MR. BLUMETTI: Objection to form.

11 THE WITNESS: I mean, ultimately, it
12 would have -- I mean, it's between Miller and
13 Spicer, but ultimately, Sean, I would say.

14 BY MS. DELGADO:

15 Q. And for policy roles, are you able to
16 say who had final say?

17 A. Meaning like what department are you
18 referring to?

19 Q. Well, various departments because there
20 are policy roles within various departments. Are
21 you saying that each had -- each and every role,
22 for instance, Omarosa, who was the policy head of
23 her group?

24 A. I think that was a little -- OPL was a
25 little bit more in flux because we had a little bit

1 of turnover and the person that was going to go in
2 there didn't. So that's a little bit different.
3 But if you're referring to like policy of like
4 economics, it would have been Gary Cohn.

5 If it was DPC, Andrew Bremberg
6 initially. You know, there's different policy -- a
7 lot of different policy heads in different
8 departments.

9 **Q.** And wouldn't you say, as you just
10 referenced earlier, that there were some senior
11 roles, such as Omarosa's, that didn't really fall
12 into any particular group with a specific policy
13 head?

14 **A.** Well, I don't know if she was a policy
15 head. She was a communications person inside of
16 OPL.

17 **Q.** And when you say "OPL," could you for
18 the record state what that means?

19 **A.** Office of Public Liaison.

20 **Q.** Which brings me to my next question.
21 What about outreach roles, who was the policy head
22 for outreach roles, and was there more than one?

23 **A.** Well, there was the American Renewal,
24 and I think Chris Liddell and -- I'm blanking on
25 his name -- that was an outreach role. That was a



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1 new office established namely by Jared Kushner.
2 And then there was Office of Public Liaison, and
3 there was inner government, IGA, their inner
4 government agency outreach role. There was a --
5 there was a lot -- quite a -- there was a few
6 different departments doing outreach but for
7 different things.

8 Q. And so, again, who did Omarosa report
9 to?

10 A. She reported to ultimately George
11 Sifakis and Steve Munisteri in OPL.

12 Q. What about Hispanic outreach roles, who
13 did that -- who would that role report to?

14 A. That would be -- I mean, there may be a
15 few of them that I just don't remember. You know,
16 there might be some -- there may be one in the
17 comms shop, one in OPL. Those would be the two off
18 the top of my mind.

19 Q. Okay. When did you learn I was
20 pregnant?

21 A. The day that you sent the tweets a few
22 days before Christmas.

23 Q. Sorry. Can you repeat that?

24 A. It was the day that you had sent the
25 tweets in the morning a few days before Christmas,



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1 was the first time I got to understand that.

2 Q. That morning prior to those tweets you
3 had had a meeting with Jason Miller, you, and Steve
4 Bannon; do you recall that?

5 A. I recall a -- I mean, we had lots of
6 meetings. I mean, a meeting, no. Maybe a
7 conversation, sure. Plenty of those.

8 Q. Okay. This might help refresh your
9 memory. It was about appointing him to White House
10 comms director in which he has reported that you
11 asked him if there was anything that you and Steve
12 needed to know prior to appointing him as comms
13 director. Does that help refresh your memory? It
14 was a few hours before the 1 p.m. announcement went
15 out, which announced Sean (lost sound) -- if that
16 helps.

17 A. Okay.

18 THE STENOGRAPHER: I'm sorry. I'm
19 sorry, if I may interrupt. You said which
20 announced who? You kind of went...

21 MS. DELGADO: Yeah, sorry.

22 BY MS. DELGADO:

23 Q. It was a few hours before the 1 p.m.
24 December 22nd announcement which announced Jason
25 Miller, Sean Spicer, Hope Hicks, and I believe one



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1 other person, and Jason was being announced as
2 comms director. That was around 1 p.m. on
3 December 22nd.

4 I believe there was a conversation, if
5 that helps, Mr. Priebus, in refreshing your
6 recollection. Obviously, you had many
7 conversations. I'm trying to help you figure out
8 which one this one was that I'm referring to.

9 It was the conversation you had the
10 morning of the announcement shortly prior to the
11 announcement with Mr. Miller about appointing him.
12 Does that help refresh your memory?

13 **A.** I think I know what you're referring to.
14 I didn't ask -- I don't remember exactly, but I
15 don't -- I didn't -- what I remember is that Jason
16 himself said -- well, I think -- I think -- let me
17 back up.

18 I think Steve Bannon and I told Jason
19 that the President would like him to serve as comms
20 director, and he, aside from agreeing to that, said
21 to me -- and I don't know if Steve was there or not
22 listening or off to the side -- that well, it's
23 good, but I think I do have -- you know, there was
24 that one issue that I had, and I don't remember
25 exactly how he put it, but he said something about

1 maybe getting some bad press because one of the
2 issues that he had in the past, and I thought and
3 he didn't describe it and I didn't ask, I thought
4 that he was describing the fact that there was
5 press reports of him going to a strip club in Las
6 Vegas and that that was going to come back up.

7 And I told him, well, I think that's old
8 news now and it's like well past, you know, we're
9 like going into 2017, that was like 2016, it was a
10 long time ago, and that was it. That was -- that
11 was the total of that issue.

12 So when you -- when you sent the tweets
13 out, I don't know who called me. It may have been
14 Sean or someone forwarded it to me. I don't -- I
15 think Sean called me and I -- or I called him or I
16 called Don McGahn, I don't know how it got to me,
17 but I know I asked like what is this about?

18 And that's when I got Don McGahn
19 involved and said -- and I think I may have called
20 Sean and said, Sean, I don't know what this is, and
21 I think I was on the phone with Don McGahn and Sean
22 later that morning after the tweets were sent out.
23 And I was also in California that day, so I was
24 three hours behind. So it was like morning,
25 mid-morning, or something like that.

1 **Q.** Okay. So standing here today, your
2 testimony is that Mr. Miller when you discussed
3 appointing him did not tell you that I was
4 pregnant? He did not reveal that?

5 **A.** He didn't. No. Because I was surprised
6 by the situation after your tweets and found out
7 what was going on.

8 **Q.** And were -- from the tweets, what did
9 you interpret them to mean, or what were you told
10 that they meant when you had these calls you
11 referenced just now?

12 **A.** I interpreted it to mean that you were
13 saying that you were pregnant and that Jason was
14 the father, I think. I mean, now that I -- I mean,
15 that's what it seemed like to me or something. I
16 mean, it was certainly, you know, akin to something
17 like that, and then that's when I think I called
18 Sean and got Don McGahn on the phone.

19 **Q.** When you say you got Don McGahn
20 involved, Mr. McGahn is an attorney, correct?

21 **A.** Yes.

22 **Q.** Why did you get him involved?

23 **A.** Because if you were pregnant by Jason
24 Miller, I would think that that would be an issue.

25 **Q.** Did you call Jason?



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1 **A.** I don't -- I don't think I did. It
2 could be that Don McGahn and another lawyer did.

3 **Q.** Did you consider revoking his
4 appointment?

5 **A.** I -- once I -- once I turned everything
6 over to the attorneys, it was -- I think it was
7 later determined that that would be what would
8 happen.

9 **Q.** When you say you met with him, you and
10 Steve, you mentioned earlier had -- you mentioned
11 earlier you described your role as unique because
12 you had some sort of shared power with Steve
13 Bannon. You and Steve were meeting with Jason
14 about his appointment because you had the power to
15 make the appointment or not make the appointment;
16 is that correct?

17 **A.** Well, the President decided -- the
18 President -- look, like I said before, it was sort
19 of a shared decision at that department head, but
20 certainly, you know, if the President wasn't
21 onboard, it wasn't going to happen, and he was
22 onboard, and if -- and if that -- that's what the
23 group decision was.

24 But at that point I don't -- my belief
25 is that people were not aware of your situation at

1 that point, at least -- at least from my vantage
2 point. You know, I don't -- I can't speak to what
3 they knew or didn't know. I can just tell you what
4 I knew.

5 **Q.** Was there any discussion about at that
6 point of the tweets what is AJ's job and is she on
7 an org chart given that Miller has been appointed?

8 **A.** No, not from my -- not from my point of
9 view.

10 **Q.** There was an e-mail I sent you the next
11 day, correct? Do you recall that?

12 **A.** I don't recall getting it, no.

13 **Q.** It's been produced in this case. Do you
14 want me to show it to you?

15 **A.** Yeah, sure.

16 MS. DELGADO: Mr. Blumetti, I don't have
17 the Bates stamped one, so I can send you the
18 Bates stamped one after, but it's in the
19 production.

20 MR. BLUMETTI: Okay. I can read it
21 aloud to reference it, to the extent it's the
22 same document.

23 MS. DELGADO: I'm sorry. Go ahead.

24 MR. BLUMETTI: No, I say I'll read the
25 Bates stamp number aloud for the record that I



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1 have in my hand to the extent it's the same
2 document I have.

3 MS. DELGADO: Thank you. I apologize,
4 but I wasn't able to extract it from the -- the
5 PDF of the production is rather large and it was
6 not being cooperative when I attempted to
7 extract small Bates stamp pages.

8 MR. BLUMETTI: Okay. Let's see which
9 document you have, and then...

10 MS. DELGADO: Okay. It is the
11 December 23rd, 2016 e-mail. I'm sending it to
12 the court reporter. Sending it now.

13 (Sharing screen.)

14 BY MS. DELGADO:

15 Q. So Mr. Priebus, this is an e-mail. If
16 you could read the date on it, please.

17 A. I see it. December 23.

18 MR. BLUMETTI: And for the record --

19 BY MS. DELGADO:

20 Q. So that's --

21 MR. BLUMETTI: I'm sorry. I'm just
22 putting the Bates stamp number on the record.
23 This e-mail is marked for identification as P1
24 through P2.

25 MS. DELGADO: Thank you.



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1 BY MS. DELGADO:

2 Q. So is that your e-mail address on there,
3 Mr. Priebus?

4 A. Yes, it is.

5 Q. Okay. Do you recall now receiving this?

6 A. Not really, no. I mean, I don't recall,
7 but, you know, it was a long time ago and maybe it
8 could have been forwarded to the lawyers. I don't
9 know.

10 Q. The date on it is what, sir?

11 A. December 23.

12 Q. Right.

13 So that's the day after the day we were
14 just discussing; is that correct?

15 A. Yes.

16 Q. Okay.

17 And in it -- we don't need to read the
18 whole thing because it's rather lengthy, but I
19 note, if you could see in the sentence that begins
20 "In the past few days," the next line over I say
21 I've, quote, been removed from the org chart; is
22 that correct?

23 A. I see that, yes.

24 Q. Okay. Did that raise any concerns in
25 terms of ensuring or investigating what I was

1 referring to?

2 **A.** Well, I wasn't -- I wouldn't have been
3 aware of whether you were in the org chart or out
4 of the org chart, but I would have forwarded this
5 e-mail most likely to the lawyers that were looking
6 into this issue.

7 **Q.** And that would be Don McGahn?

8 **A.** Don McGahn, and he was working with
9 another lawyer by the name of Eric Drieband. I
10 think -- I think that was his name. But, again, I
11 don't know whether you were in the chart or not,
12 so...

13 **Q.** You didn't think to inquire?

14 MR. BLUMETTI: Objection to form.

15 THE WITNESS: This was -- at that point
16 the lawyers were handling all of this.

17 BY MS. DELGADO:

18 **Q.** Did you make any suggestion?

19 MR. BLUMETTI: Objection to form.

20 THE WITNESS: I don't remember whether I
21 made a suggestion or not. But I think I was
22 going to listen to -- you know, allow, as I
23 said, the department head to make the decision
24 and obviously listen to counsel's advice and let
25 the process move forward that way.



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1 BY MS. DELGADO:

2 Q. So when you say "the department head,"
3 am I correct you mean Sean?

4 A. Yeah, at that point Sean.

5 Q. Why wasn't Miller still the department
6 head, in your mind?

7 A. Well, I think because he would have been
8 subject to this review.

9 Q. What do you mean by "review"?

10 A. Well, I mean, this issue. I mean, this
11 issue that now has come to light that the lawyers
12 are looking at and assuming doing some level of a
13 discussion and analysis.

14 Q. Do you know if Mr. Miller was asked to
15 withdraw from the role or told --

16 A. I don't -- I'm sorry. I don't
17 remember --

18 Q. Was he asked to withdraw or told to
19 withdraw or did he voluntarily withdraw from the
20 role?

21 A. I don't remember exactly what and how
22 that all kind of shook out.

23 Q. You've mentioned earlier, as had Sean,
24 about Jared Kushner's involvement in hiring. Are
25 you aware of a book author that Mr. Miller spoke to



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1 in which Mr. Miller conveyed that Mr. Kushner
2 ultimately told him he needed to step away from the
3 role? Does that ring a bell?

4 **A.** No.

5 **Q.** Is that something that in your
6 experience or recollection of Mr. Kushner's role
7 could have happened? Does that sound like a
8 plausible recollection by Mr. Miller?

9 **A.** Honestly, I just don't know what and
10 how. You know, in the end whether it was Jason,
11 whether it was the lawyers, but certainly from my
12 perspective this issue was in the lawyer's hands
13 and the department head's hands.

14 **Q.** Hmm-hmm.

15 THE STENOGRAPHER: I'm sorry. Do you
16 want me to take it down already, or would you
17 still like it up?

18 MS. DELGADO: Oh, take it down. Thank
19 you. I'm done with that exhibit. Thank you.

20 So that will be Exhibit 3.

21 THE STENOGRAPHER: 3, okay.

22 (Thereupon, Plaintiff's Exhibit No. 3
23 was marked for identification.)

24 BY MS. DELGADO:

25 **Q.** And so that's December 23rd.



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1 In your recollection, what happens
2 between that e-mail and the following evening,
3 which I'm assuming, but stop if I'm wrong, you
4 probably recall when Mr. Miller stepped away?

5 **A.** I remember when he stepped away. I
6 don't remember whether it was the following evening
7 or two evenings or the same day, but I remember he
8 stepped away.

9 **Q.** Right. It might be two evenings.
10 You're right. I'll retract that. I'm not sure
11 when it was.

12 But do you remember anything from that
13 e-mail to the point Mr. Miller stepped away? Did
14 you have any involvement at all, or did you, as we
15 say, completely leave it up to the lawyers?

16 **A.** Well, I mean, I communicated with the
17 lawyers, yes.

18 **Q.** Right.

19 And I don't want to hear about what your
20 communications with the lawyers were to the extent
21 that there was any privileged communication there.

22 Were they representing you in any sense?
23 **A.** They were representing the White House
24 and I believe the transition.

25 **Q.** So they were not representing you?



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1 **A.** Well, I mean, to the extent that I was
2 involved in the transition, sure.

3 **Q.** Did at any point they say we're
4 representing you, Reince Priebus, here's an
5 engagement letter?

6 **A.** No.

7 **Q.** So what were your discussions with
8 Mr. Drieband and/or with Mr. McGahn?

9 MR. BLUMETTI: I would object to the
10 extent that it's protected by attorney-client
11 privilege. Just because the witness wasn't
12 retained as a client doesn't mean it wasn't a
13 privileged communication with an employee of the
14 transition team at the White House.

15 MS. DELGADO: We can take that up.

16 Okay. We can certify that.

17 BY MS. DELGADO:

18 **Q.** You know -- well, we'll keep going a
19 couple of more minutes. I know I'm at my 11:30
20 stop time.

21 Are you aware that Mr. Drieband
22 communicated an offer of employment with the
23 campaign to me?

24 **A.** No.

25 **Q.** So you were never asked again -- apart



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1 from those December 22nd tweets and forwarding that
2 December 23rd e-mail, you never asked or were
3 updated or informed as to what went on?

4 **A.** Yes. I mean, I communicated with the
5 lawyers about what was going on, and they made an
6 analysis of it, and after that Jason, one way or
7 the other, wasn't in the role.

8 **Q.** And did you inquire, aside from Jason
9 not being in the role, well, what is happening with
10 AJ?

11 **A.** As I said before, I never -- I don't
12 know nor did I perceive you to be in the matrix of
13 hires in the first place, so I don't know whether
14 you were or whether you weren't. So there was --
15 there wasn't -- it just wasn't -- didn't -- it
16 didn't come up to me.

17 **Q.** Let me probe you on that a little, if I
18 may. When you say you didn't perceive me of being
19 in the matrix of hires, so is it your --

20 **A.** Perceive meaning I don't have knowledge
21 of you being in that -- in that matrix.

22 **Q.** But you felt that my tweets about the
23 pregnancy were serious enough and my not having a
24 job and the discrimination were serious enough to
25 get an attorney involved?

1 MR. BLUMETTI: Objection to form.

2 THE WITNESS: Well, I mean, I think that
3 if a campaign -- someone on the -- two people on
4 the campaign staff, if there's an allegation
5 that was going on in the campaign and you're
6 hiring someone to be the head of communications,
7 I think it would be a natural thing to bring in
8 the head of the communications department, Sean
9 Spicer, and the counsel to say this needs to be
10 looked at. That's a pretty normal thing to do,
11 I would believe.

12 BY MS. DELGADO:

13 Q. From a legal angle, or from a PR angle?

14 A. Well, both I mean, but I mean, I think
15 that -- I mean, it would be both. I mean, in my
16 mind, it was both, probably more of a legal and a
17 like, hey, what's going on here? You know, what
18 does this mean, and someone needs to look at this.
19 That's my viewpoint. I mean, an investigation
20 should be had. It's pretty normal.

21 Q. And going back to -- and I know you've
22 clarified you only meant in a literal sense that
23 you were not aware of my being in a literal matrix
24 or list that you had personally seen. In a
25 nonliteral form, would it be your understanding

1 that someone who was on the transition team, who
2 was a senior advisor with a Harvard law degree, who
3 spoke Spanish, had done Hispanic outreach, was well
4 liked by Mr. Trump, well liked by the Trump family,
5 would it be your impression, understanding,
6 viewpoint, that that person probably is in the
7 pipeline for a White House job?

88 MR. BLUMETTI: Objection to form.

15 BY MS. DELGADO:

16 **Q.** Did anyone who was in the transition
17 team not go into the White House?

18 **A.** I wouldn't know. I mean, I didn't do a
19 head count of the transition team and a calculation
20 of who was there and who didn't. I wouldn't -- I
21 don't know.

22 **Q.** Is it typical for individuals in a
23 transition team to go into the White House?
24 Because the transition team is rather small, is it
25 not?

1 MR. BLUMETTI: Form.

2 THE WITNESS: I don't know. I've only
3 been in one transition team, so I wouldn't know
4 what's typical or not. It certainly wasn't that
5 typical. I think it was a pretty unique
6 transition.

7 BY MS. DELGADO:

8 Q. Was there a Sanders on the transition
9 team; do you know, Sarah Huckabee Sanders?

10 A. I think she was. She certainly -- I
11 don't know. I don't know if she was or not. I
12 know Sean was.

13 Q. And Drieband was an employment law
14 attorney, right?

15 A. I believe so.

16 MS. DELGADO: Okay. Then now is a good
17 time for a break.

18 THE WITNESS: Thank you.

19 MS. DELGADO: No. Thank you. Okay. So
20 five minutes, unless anyone needs longer?

21 THE WITNESS: Well, I mean, why don't we
22 just go ten just to -- you know, 11:45, use the
23 restroom, check e-mails and come back, if that's
24 okay?

25 MS. DELGADO: Sounds good. I have



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1 11:36. My time might be -- yes.

2 THE WITNESS: 11:45? I'm just going to
3 put it on --

4 MS. DELGADO: Perfect. Come back at
5 11:45. Thank you.

6 (At this time a recess was taken.)

7 BY MS. DELGADO:

8 Q. Mr. Priebus, did Donald Trump give any
9 opinion on any of what we were just discussing,
10 whether it be my employment, the pregnancy, any
11 related issue or thereof?

12 MR. BLUMETTI: Objection to form.

13 BY MS. DELGADO:

14 Q. And I can rephrase it. I can rephrase
15 it.

16 Let's go one by one. Did Donald Trump
17 give any opinion on my employment, that you recall?

18 A. When?

19 Q. At any point.

20 Have you ever heard or seen any
21 communication or been provided any message from
22 Mr. Trump or had any communication of any kind with
23 Mr. Trump about me, including but not limited to,
24 about employment?

25 MR. BLUMETTI: Objection to form.



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1 THE WITNESS: Not about employment.

2 BY MS. DELGADO:

3 Q. Okay. What was it about?

4 A. I think when the lawsuit was filed, I
5 think he thought it was frivolous or inappropriate
6 or wrong and sort of out of bounds. But that --

7 Q. When you say "when the lawsuit" -- go
8 ahead. Sorry.

9 A. I was saying that's the only -- when you
10 ask a question like that, it's the only thing that
11 I can remember.

12 Q. And when you say "when the lawsuit," do
13 you mean this lawsuit?

14 A. Yeah. But never commented on you as far
15 as being an employee of the White House and never
16 came up --

17 Q. So --

18 A. -- that I --

19 Q. Uh-hmm. Go ahead.

20 A. -- that I remember.

21 Q. So you're referencing this lawsuit which
22 was filed in December 2019?

23 A. No. I'm referring to I think there's a
24 previous iteration of it that came in 2017 at some
25 point.

1 **Q.** Trying to help you figure out what
2 you're referring to here because there wasn't a
3 lawsuit filed in 2017, so...

4 **A.** I don't know if it was a draft complaint
5 or something that you had sent in 2017. There was
6 something that happened in 2017 that brought some
7 of these allegations to light.

8 **Q.** Okay. I understand you now. Thank you
9 for clarifying.

10 And where did this conversation take
11 place?

12 **A.** Either in the White House or over the
13 telephone with him.

14 **Q.** And who else was on the call?

15 **A.** I don't -- I don't think anyone. Maybe
16 Don McGahn.

17 **Q.** And do you recall why it was mentioned?

18 **A.** I think there was a document that I got
19 when I was in the White House that either was a
20 draft complaint or something from you with these
21 allegations in it. I'm just giving you my best
22 memory.

23 **Q.** Right.

24 And why was that raised with Donald
25 Trump?

1 **A.** Because I think he was mentioned in the
2 allegations or the campaign, the transition, a
3 bunch of people. I think -- I think my best
4 recollection is that there was something with these
5 allegations that were sent, and I --

6 **Q.** And your -- hmm-hmm.

7 **A.** -- and I think I and Don McGahn are
8 some -- somehow I recall informing the President of
9 this, and that was like one time that I remember it
10 coming up because you asked me an all-encompassing
11 question, and that's my only recollection of his
12 view of it.

13 **Q.** And to make sure I heard you correctly,
14 you said your recollection was that he thought it
15 was, quote, frivolous or inappropriate?

16 **A.** Yeah, like it's not -- it can't -- it's
17 not -- yeah, something like that.

18 **Q.** And he thought the whole thing was or
19 parts of it?

20 **A.** I don't -- it was just -- it wasn't --
21 we didn't dissect it. I didn't get into -- I don't
22 remember any detail. I just remember -- I'm trying
23 to answer your question in the best way I can
24 without not disclosing everything I can remember
25 that might pertain to your question.



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1 **Q.** Understood.

2 So that was the only time you recall
3 ever having a conversation or written communication
4 or any type of communication involving or with
5 Mr. Trump where I came up or was discussed?

6 **A.** That's my recollection.

7 **Q.** Even though Mr. Spicer referred to the
8 tweets as a 5-alarm fire and his phone was going
9 off all weekend and it was on the cover of Drudge,
10 it wasn't something Mr. Trump spoke of, that you
11 know of?

12 MR. BLUMETTI: Objection to form, asked
13 and answered.

14 THE WITNESS: I don't -- I'm not
15 suggesting to you that when that issue came up
16 at the end of December that it wasn't
17 communicating that the President like look,
18 there's an issue that the lawyers are looking
19 at, here's what we know and here's what the
20 conclusion is, I'm not saying that didn't
21 happen.

22 I just don't remember specifically what
23 was said or what he said or -- you know,
24 obviously, it was an issue, but I don't remember
25 the details for you as I sit here today.



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1 BY MS. DELGADO:

2 Q. Would it have been brought to his
3 attention?

4 A. What?

5 Q. The tweets, the complaint, the
6 December 22nd to 24th period?

7 MR. BLUMETTI: Objection to form.

8 THE WITNESS: I'm sure -- I would be --
9 I would be surprised that it wasn't brought to
10 his attention, certainly the allegation in
11 regard to Jason Miller and you and your tweets,
12 but I don't remember specifically what was
13 discussed. I remember the lawyers handling the
14 matter. That's what I remember.

15 BY MS. DELGADO:

16 Q. And to be clear, your understanding is
17 those lawyers represented the White House and the
18 transition team?

19 A. Excuse me? Yes. I -- right. I think
20 so.

21 Q. And did you have any communications with
22 Mr. Miller during -- post those tweets, the first
23 set of tweets, or any time after through early
24 2017?

25 A. You mean during the conversations I had



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1 with the lawyers?

2 Q. And I don't want to misstate my
3 question. It's not during the conversations with
4 the lawyers. It's any time after my first tweet,
5 December 22nd through early 2017, when did you
6 speak to Mr. Miller?

7 A. If I did, it would have been with
8 lawyers.

9 Q. And you don't remember if you did?

10 A. I have a recollection of speaking with
11 lawyers, with Jason on the phone, but that's the
12 only recollection I have of communicating with
13 Jason about this issue, was the morning after your
14 tweets.

15 Q. And do you recall what was said?

16 MR. BLUMETTI: Objection, form. Object
17 to the extent it calls for the disclosure of
18 attorney-client privilege.

19 MS. DELGADO: It's a conversation with
20 Mr. Miller, it's not attorney-client privilege.
21 Even if it were by an attorney representing
22 Mr. Priebus, it's a conversation with
23 Mr. Miller.

24 THE WITNESS: I believe that at the
25 conclusion of the call, that the -- that he



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1 pretty much confirmed that these -- you know,
2 that the affair and the fact that you were
3 pregnant was true, and then that was the basic
4 gist of the conversation.

5 He had wondered whether it was true or
6 not out loud. I didn't believe him, and I don't
7 think the lawyers believed him either.

8 BY MS. DELGADO:

9 Q. And what was the conclusion of that
10 call?

11 A. The conclusion was thank you very much
12 and the lawyers took over.

13 Q. So it was more just the kind of call to
14 get facts from him?

15 A. Right.

16 Q. No directive was given to him as far as
17 you're no longer going to be in the White House or
18 you will be?

19 A. Well, I mean, not at that initial point.
20 That was just the one time I remember, and it's a
21 vague memory, but it's the one time I remember
22 discussing it where he was part of a conversation.

23 Q. And you say he stated that he wondered
24 aloud whether I was actually pregnant or not and
25 you did -- you did believe that I was?

1 **A.** I didn't believe Jason.

2 **Q.** Okay. Okay.

3 Would it be realistic for Jason Miller
4 to be comms director and for a woman he impregnated
5 to also be in the West Wing?

6 MR. BLUMETTI: Objection to form.

7 THE WITNESS: Yeah, what do you -- say
8 that again.

9 BY MS. DELGADO:

10 **Q.** Would it be realistic for Jason Miller
11 to be comms director and for a woman he impregnated
12 to both serve in the White House in the West Wing
13 simultaneously?

14 MR. BLUMETTI: Objection to form and the
15 use of the word "realistic."

16 BY MS. DELGADO:

17 **Q.** In your opinion.

18 **A.** I don't know. There seemed to be -- it
19 doesn't seem to be -- it doesn't seem to be
20 appropriate to me, but, I mean, I guess -- you
21 know, I guess depending on the circumstances, but
22 it seems inappropriate from beginning to end. It
23 seems inappropriate to have a relationship with a
24 subordinate. It seems inappropriate from the very
25 start. So to me the whole thing is bad from

1 beginning to end.

2 Q. Was my pregnancy embarrassing to the
3 campaign?

4 MR. BLUMETTI: Object to form.

5 THE WITNESS: I don't -- I don't know
6 what the campaign thinks or who you're referring
7 to as the campaign, but it certainly -- the
8 circumstances are, in my opinion, inappropriate.

9 I think to most people it would be
10 inappropriate.

11 BY MS. DELGADO:

12 Q. Was my pregnancy embarrassing to the
13 incoming Trump administration?

14 MR. BLUMETTI: Objection to form.

15 BY MS. DELGADO:

16 Q. In your opinion.

17 A. I don't know what the incoming -- I
18 mean, certainly he wasn't hired, so, I mean, the
19 conclusions were that he wasn't going to come in
20 and take this job because of the inappropriateness
21 of the situation that he participated in.

22 Q. Did you ever see any document or did you
23 ever have any conversation or were you ever part of
24 any conversation, even in a passive way, where my
25 employment or nonemployment was discussed?



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1 MR. BLUMETTI: Objection to form, asked
2 and answered.

3 THE WITNESS: Can you -- can you repeat
4 that just so that when I --

5 BY MS. DELGADO:

6 Q. I didn't ask --

7 A. I don't ever -- I don't ever remember
8 having any conversation with any person about your
9 employment or nonemployment in the White House.
10 And I don't -- I don't -- or I don't think any
11 conversation even before that period of time, so
12 no.

13 Q. Did you hear of any such conversations
14 or any documents existing that referenced
15 potential, actual, revoked employment of mine?

16 A. Did you say "revoked"?

17 Q. Revoked.

18 Potential employment or actual
19 employment or revoked employment; anything dealing
20 with employment of my -- soft employment; anything
21 of mine, even if you were not a party to the
22 conversation, did you hear of any such conversation
23 or hear of the existence of any such document?

24 MR. BLUMETTI: Objection to form.

25 BY MS. DELGADO:

1 Q. And I can break it up, if you'd like.

2 A. Yeah, I don't --

3 Q. I just wanted to speed things up.

4 A. No, I think the answer is no. I don't
5 remember you being discussed for employment or
6 nonemployment. You know, Sean would be dealing
7 with that, but I don't remember you specifically
8 ever being discussed to be employed or being in the
9 org chart, as you brought up, or listed or not
10 listed. I just don't -- I don't believe that that
11 happened.

12 Q. But wouldn't it have come up,
13 Mr. Priebus, when the tweets happened? Wouldn't
14 someone, even if it's not you, have said, oh, and
15 by the way, is there a job for her? What is she
16 complaining about? It seems that would -- that red
17 flag would arise, at least once the situation with
18 Jason, especially if you have lawyers involved,
19 came to light?

20 Still you're saying there was no
21 discussion of let's make sure her job isn't
22 compromised or let's kick her out or any -- no
23 discussion of a job or lack thereof even after this
24 became a 5-alarm fire, as Sean Spicer said?

25 MR. BLUMETTI: Objection to form.



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1 THE WITNESS: I don't -- I don't
2 believe -- my belief is that you were never in
3 the matrix to get -- you were not in -- as I sit
4 here today, you were not in the matrix to get a
5 job. I don't -- it never came up to me because
6 I don't think it was in Sean's opinion, but that
7 wasn't something I would have known at that
8 time.

9 The only thing I vaguely remember is
10 that someone told me that Hope Hicks had said
11 that, you know, she wouldn't come in the White
12 House if you were coming in the White House. I
13 don't know if I heard that after all this or
14 before or when. That's the only time I ever
15 remember it, and I -- I just -- it just never
16 came up.

17 I do believe that the lawyers looked at
18 the situation that certainly involved you, so of
19 course you would have come up in those
20 conversations with the lawyers. And then the
21 decision was that Miller didn't come into the
22 White House to the extent that the tweets and
23 the situation affected you, I wouldn't be
24 privy -- I don't know that.

25 BY MS. DELGADO:



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1 **Q.** But you said earlier when you say now
2 that I was never in the matrix, you said earlier
3 you didn't know who was in what charts.

4 **A.** I'm saying it never came to me that you
5 were in the matrix before --

6 **Q.** Oh.

7 **A.** -- January 20th.

8 **Q.** So not that I was never in it, just that
9 you weren't aware if I was?

10 **A.** Yeah. I wasn't aware if you were or
11 weren't.

12 **Q.** Okay.

13 **A.** Like I said, I let -- I let Sean put,
14 you know, his staff together, that he wanted to put
15 together.

16 **Q.** Were you ever told that for some reason
17 I was only interested in Sean's group or working in
18 press or comms?

19 **A.** No one ever -- you were just never
20 brought up to me, sorry to say, but...

21 **Q.** No. Fair enough.

22 I just -- you repeatedly have referenced
23 that group, so I was just wondering if you were
24 under some impression that I had specifically
25 sought an interest in or sought employment in that

1 particular group of Sean's. And you're saying
2 you --

3 **A.** I don't know what -- and I don't know
4 what groups you were trying to get employed by, but
5 to the extent that it was within the communications
6 job, that's why I keep referencing Sean as being in
7 charge of that.

8 **Q.** Sure.

9 And did Hope Hicks have decision-making
10 authority? What group did she lead?

11 **A.** She was in the -- in the oval with the
12 President.

13 **Q.** Who did she report to?

14 **A.** The President and Sean, probably; a
15 little bit of both.

16 **Q.** All right. I will have a video to show
17 you here a little later.

18 Were you aware of Hope Hicks'
19 extramarital affair with Corey Lewandowski?

20 **A.** No. I mean, other than what was in a
21 page 6 article.

22 **Q.** What page 6 article?

23 **A.** I don't know. I remember who -- I
24 remember there was an article of them shouting at
25 each other and that's what I remember. But I'm not



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1 aware of any affair.

2 Q. So sitting here today, your testimony
3 under oath is that the only thing you have ever
4 heard about Hope Hicks and Corey Lewandowski having
5 an affair is strictly a page 6 article where -- and
6 I know the article you're referring to, where Hope
7 Hicks was having a crying and screaming match with
8 Mr. Lewandowski outside of Trump Tower, that's the
9 only time you've heard of reference to Corey and
10 Hope?

11 MR. BLUMETTI: Objection to form.

12 THE WITNESS: I may have heard rumors,
13 but from where and when, I don't know, but
14 that's about it.

15 BY MS. DELGADO:

16 Q. Do you concede that there may have been
17 issues related to Ms. Hicks and Mr. Lewandowski
18 that would have prompted her to have made the
19 comment that you referenced she may have made
20 earlier?

21 MR. BLUMETTI: Objection.

22 THE WITNESS: I don't know. I just
23 never got into it.

24 BY MS. DELGADO:

25 Q. Well, when was the last time you spoke



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1 with Jason Miller?

2 **A.** I saw him by coincidence at the Palm
3 Beach Airport about two weeks ago.

4 **Q.** And what was that conversation like?

5 **A.** Hmm, about five minutes about the
6 campaign, being on the road. He was going back to
7 D.C. Maybe a little bit about the primary.

8 **Q.** Anything about this lawsuit?

9 **A.** No.

10 And then we got on the plane and we were
11 sitting apart and that was it.

12 **Q.** Are you familiar with reports of -- and
13 maybe not just reports, but are you familiar with
14 statements Mr. Trump has made or reports about
15 Mr. Trump in which it has been mentioned how much
16 Mr. Trump values those who do a good job defending
17 him or advocating for him on television?

18 MR. BLUMETTI: Objection to form.

19 THE WITNESS: He definitely likes people
20 who do a good job of defending him on
21 television, I'll give you that.

22 BY MS. DELGADO:

23 **Q.** So would you say that, and particular in
24 the Trump administration, being somebody who
25 advocated for Mr. Trump on TV was definitely a plus



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1 as a qualifier for a job?

2 **A.** I don't know about a qualifier, but he
3 liked it.

4 **Q.** Fair enough.

5 Do you recall the statement that was put
6 out when Fidel Castro died on behalf of Mr. Trump?

7 **A.** No.

8 **Q.** Do you remember from the campaign who
9 were the individuals, the senior advisors besides
10 myself, who would go on television -- whose role
11 was to go on television to defend Mr. Trump? Do
12 you remember some of those names?

13 **A.** I don't know if it was their role to go
14 on TV, but there were people that were on TV that
15 were very defensive of President Trump.

16 **Q.** And did any of those seek but not go
17 into the White House? Or let me make it clearer.
18 Which ones of those didn't go into the White House?

19 MR. BLUMETTI: Objection to form.

20 THE WITNESS: I don't know, because I
21 don't know all the people you're talking about.
22 I mean...

23 BY MS. DELGADO:

24 **Q.** Okay. Let me name a --

25 **A.** I honestly don't know all the people



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1 that ever defended the President on TV. I mean,
2 that's a big -- it's -- I defended the President,
3 other people. I wasn't -- are you suggesting that
4 there were paid people on TV?

5 **Q.** No.

6 My question was from the campaign, and
7 I'll just make it simpler for you then. I'll just
8 give you the names. Boris Epshteyn, did he go into
9 the White House?

10 **A.** For about two months.

11 **Q.** Why just two months?

12 **A.** I'm not a hundred percent sure if I'd be
13 able to say.

14 **Q.** What do you mean?

15 **A.** I'm not sure. I mean, I would have to
16 talk to my attorney to find out whether I can say.

17 MR. BLUMETTI: Is it subject to a
18 confidentiality order?

19 THE WITNESS: It -- I would have to talk
20 to you privately. I just have to make sure.

21 MR. BLUMETTI: Okay. We can go off the
22 record if you don't have a question pending.

23 MS. DELGADO: I'd rather not
24 mid-deposition.

25 BY MS. DELGADO:

1 **Q.** Who is the attorney? When you say "my
2 attorney," are you referencing --

3 **A.** I'm talking about Jared. I'm talking
4 about Jared. I was going to ask Jared a question
5 before I answer. I'm not worrying about answering
6 the question. It's not -- I just have to make sure
7 I'm not violating anything before answering a
8 question like that.

9 **Q.** Was there a confidentiality agreement
10 you signed?

11 **A.** I'm not sure.

12 **Q.** You're not sure you signed an agreement?

13 **A.** Trust me, if you knew what I was
14 thinking about, you'd understand, but I can't -- I
15 have to -- I think I have got to ask Jared first.

16 **Q.** Okay. We can circle back to that at the
17 end.

18 **A.** Okay.

19 **Q.** Nevertheless, Boris did go into the
20 White House, correct?

21 **A.** Yes.

22 **Q.** Okay. And Omarosa went into the White
23 House, correct?

24 **A.** Yes.

25 **Q.** And Sarah Sanders went into the White

1 House, correct?

2 **A.** Yes.

3 **Q.** Okay. And even though Boris was only
4 there two months, am I correct in my recollection
5 that he then obtained almost immediately thereafter
6 a job with Sinclair Broadcasting Group? Does that
7 ring a bell?

8 **A.** It rings a bell.

9 **Q.** So would you say even two months in the
10 White House can be a nice jumping point for a great
11 job, is that a fair --

12 **A.** For some people, but for others not. It
13 depends.

14 **Q.** Like what's an example, someone for whom
15 it hasn't been a good jumping point?

16 **A.** I think that there are plenty of people
17 that didn't get the benefit of serving in the White
18 House as opposed to others.

19 **Q.** Can you give some examples?

20 **A.** I'd rather not.

21 **Q.** Why is that?

22 **A.** Well, I mean, some of these folks aren't
23 doing very well. I don't think Mark Meadows is
24 very happy. I don't think John Kelly is ecstatic.
25 I don't think Rex Tillerson is, you know, thrilled.

1 I mean, I think there's a lot of folks that, you
2 know, the corporate world I don't believe has been
3 particularly kind to Trump alumni. I don't think
4 that the media world has been particularly kind to
5 Trump alumni.

6 I think there are some exceptions, but
7 it -- I don't think it would -- I certainly don't
8 think that the -- you know, the Obama alumni and
9 the Bush alumni I believe were treated far better
10 than the Trump alumni have been.

11 Q. Fair enough. And I think there are
12 different groups. As you say, it depends; like a
13 John Kelly type or a Boris. I suppose it depends
14 on your area of focus and your background. I
15 understand that.

16 But let's take the three counterparts of
17 mine on the campaign. Boris, you agreed, then went
18 to Sinclair Broadcast Group. Oh, do you recall --
19 \$500,000 a year, do you recall reading that
20 salary --

21 A. No.

22 Q. -- somewhere? Okay.

23 And Omarosa went on to write a best
24 seller; is that correct? Does that ring a bell?

25 A. Yeah. Like a tell-all book where she's

1 recording people in the White House. I mean, yeah,
2 I guess if that's what you consider to be success,
3 sure.

4 Q. Speaking financially, would that be a
5 success financially?

6 A. Writing a tell-all book and disclosing
7 conversations, I guess if that's -- if you consider
8 that success financially, fine. I don't know if
9 it's ultimately successful because I think when you
10 do that, you end up potentially hurting yourself in
11 the end.

12 Q. And Sarah, once she left and used her
13 time in the White House, too, it seems furthered
14 her political career and is now governor; is that
15 accurate?

16 A. Yes.

17 Q. Okay. And do you -- I think I -- I may
18 have already asked this, so if I did, please
19 correct me, but do you recall which senior advisors
20 from the campaign didn't get a job?

21 A. I don't recall. I mean, I'd have to do
22 research and figure it out.

23 Q. Do you recall anyone saying, Reince, I
24 worked on the campaign, I would like a job at a
25 senior level or a mid-level on the campaign, and



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1 not receiving a job?

2 **A.** I'd have to think about it a little bit
3 further. I'm sure there are plenty.

4 **Q.** But none comes to mind?

5 **A.** Yeah. I mean, there are RNC people that
6 wanted jobs and didn't get jobs.

7 **Q.** But I mean the campaign.

8 **A.** I don't think I was their go-to person
9 to talk about White House jobs from the campaign.
10 There were others like Steve and Kellyanne and Dave
11 Bossie and Jared that I think were plugging people
12 in that they felt -- were advocating for people
13 that they felt should come on board. And I think
14 they covered a lot of those people.

15 And I was probably the -- me and Katie
16 Walsh were the point people for folks that applied
17 from the RNC that were getting pinged on. I don't
18 think that the campaign people naturally came to
19 me.

20 **Q.** Did Mr. Miller in any of the
21 conversations that were had ever ask, demand, or
22 request that I not be in the White House?

23 **A.** You never came up from -- from him to me
24 about getting a job in the White House.

25 **Q.** I mean more when he was asked to leave,



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1 if he was asked to leave, at that point did he make
2 any request?

3 **A.** Not to me.

4 **Q.** Okay. Would you concede, and please
5 don't take offense to this, but would you concede
6 that there was some pushback, and it may have been
7 harder for folks from the RNC to get a job versus
8 from the campaign because of the fact that the RNC
9 was -- I should say not the fact -- but the RNC
10 folks were perceived as being not the most
11 supportive of Trump, and I don't mean you, sir, but
12 the RNC ranks overall not as supportive of Trump
13 during the primaries and even through the general
14 elections, especially through the *Access Hollywood*
15 tape revelation? Would you say that's fair?

16 MR. BLUMETTI: Objection to form.

17 THE WITNESS: What's fair?

18 BY MS. DELGADO:

19 **Q.** To say that it would be harder to get a
20 job coming from the RNC than from the campaign
21 because Mr. Trump was aware that the RNC had been
22 quite resistant to him. Not you personally,
23 although you did criticize him publicly a few
24 occasions, but the campaign was seen -- the
25 campaign folks were seen by Mr. Trump and by the



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1 press as much more pro-Trump than the RNC was. And
2 again, I don't mean you.

3 **A.** I certainly saw the press that made
4 those conclusions, but I don't -- the President
5 never told me that, that that was his perception.

6 Listen, I'm aware of the press. I'm
7 aware of what people in the press said. But as to
8 whether -- you're asking me whether it was
9 communicated to me, and I mean, eventually it was
10 clear that there was a division that was building
11 between the RNC and the campaign, from the press,
12 but it -- we were doing our best to meld the two
13 together. And I think that's partly why I was
14 named as a co-equal by the President with Steve
15 Bannon. But I don't know for sure, because at the
16 time we were just trying to keep everyone together.

17 **Q.** Once he won the nomination; is that
18 correct?

19 **A.** I kind of lost track of your question.
20 Once he won the nomination?

21 **Q.** Would you say the RNC employees were as
22 pro-Trump as the campaign employees?

23 **A.** Depends which employees you're talking
24 about.

25 **Q.** Overall, if you had to take the mean or



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1 the average, would you say it's fair to say that
2 the campaign employees, given they had opted to
3 work for Donald Trump, especially those who were
4 working with the campaign prior to Trump securing
5 the nomination, would you say those were generally
6 more pro-Trump than the RNC employees?

7 MR. BLUMETTI: Objection to form.

11 BY MS. DELGADO:

12 **Q.** Was there any employee at the RNC that
13 you recall that was particularly in favor of
14 Mr. Trump?

A. When he was the nominee?

Q. No, prior to his being a nominee.

17 **A.** It's a different role. I mean, you know
18 that --

19 Q. Right.

20 **A.** -- the role of the RNC is to support
21 whoever the nominee is.

22 **Q.** Correct. Correct. Understood. I'm not
23 faulting.

24 But nonetheless, whether it's a facet of
25 the role in which they are boxed in by or not, the

1 outwardly pro-Trump individuals are much more
2 likely to be found in the campaign than in the RNC;
3 is that correct?

4 **A.** I don't know if that's true or not. I
5 know that's what you perceive to be true, but I
6 think there are good apples and bad apples that
7 come from both scenarios that you are trying to
8 outline, so --

9 **Q.** Okay. I'll give you an example.

10 **A.** -- I would not accept that every person
11 that worked in the Trump campaign were, you know,
12 super pro-Trump and always loyal and always good
13 actors, and I wouldn't say the same about the RNC.
14 I think that there are people -- you know, you have
15 to judge everything on an individual basis.

16 **Q.** Let me give you -- and I didn't say all
17 from the campaign were. I was saying overall. But
18 I'll give you an example.

19 Did you hire -- because you were
20 reported as specifically hiring him -- a Mr. Raj
21 Shah?

22 **A.** At the RNC he was our research director.

23 **Q.** Who hired him to be deputy White House
24 press secretary?

25 **A.** Sean.

1 **Q.** Sean did?

2 **A.** I mean, I'm certain he -- I don't know.

3 You'd have to ask him. Because how, you know, that
4 processed and maybe other people met with him,
5 maybe he brought him in to see the President, I
6 don't know what process he went through for that.

7 **Q.** And he called Trump "a deplorable"
8 during the election, didn't he?

9 **A.** I don't remember that.

10 **Q.** And he called the release of the Access
11 *Hollywood tape*, well, "some justice." You don't
12 remember that?

13 **A.** No.

14 **Q.** Okay. And didn't he also help get
15 embarrassing footage of Mr. Trump when he was
16 working for and advocating for Jeb Bush?

17 **A.** I don't know. I mean...

18 **Q.** Fair enough. If you don't know, just
19 asking. And we'll see.

20 And so I think we segued off track. I
21 think I was asking you a question about whether
22 Mr. Miller at the point that it was either he opted
23 to leave or he was told to leave, did not make any
24 requests as to any job or potential job regarding
25 me?

1 **A.** I don't remember him saying anything
2 like that, but I think at that point he was talking
3 to the lawyers.

4 **Q.** Okay. Fair enough.

5 Do you have any idea, if I didn't have a
6 White House job, which I'm already conceding you
7 don't know if I did or didn't; I'm not asking you
8 to repeat all that that's been discussed already.
9 But if I didn't or if it had been decided that I
10 did, but I no longer did, do you have any idea or
11 information or reason to believe or explain why Mr.
12 Spicer wouldn't simply come on and tell me, AJ, you
13 don't have a job?

14 **A.** I don't know why he -- I don't know the
15 answer to that question.

16 **Q.** Okay. Asking if you did. If you
17 don't --

18 **A.** Yeah.

19 **Q.** -- that's okay.

20 And Sean during his deposition spoke of
21 particular individuals and said they were, quote,
22 in the pipeline for employment. What does "the
23 pipeline" mean, if you know?

24 **A.** I don't know what he meant by that.

25 **Q.** Okay.

1 **A.** Maybe it was just a list of a bunch of
2 potential hires.

3 **Q.** There was an article about Mr. Paul
4 Manafort having a friend who wanted a job, a high
5 ranking friend in the banking industry who sent his
6 resumé to Jared Kushner. Is that because, as you
7 mentioned earlier, Mr. Kushner had power in hiring
8 and hiring decisions?

9 MR. BLUMETTI: Objection to form.

10 THE WITNESS: I don't know why he sent
11 it to Jared, but I would say that in most cases
12 people who wanted jobs sent information and
13 resumes to whoever they had a connection to, to
14 try and get a job, or say, look at this person,
15 look at that person, here's a couple resumes,
16 here's some smart people. So I think most --
17 you know, I wouldn't be surprised. You know, a
18 lot of folks got e-mails like that.

19 BY MS. DELGADO:

20 **Q.** And the ultimate decision maker, would
21 you say it was Trump, or did Trump in some
22 instances just go with what was brought to him?

23 MR. BLUMETTI: Objection, form.

24 THE WITNESS: I would think that, like I
25 said before, the department heads had reign over



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1 their own departments, and in most cases the
2 President would be involved on major department
3 hires, at least discussed and get sign-off.

4 And then from there, you know, there
5 were only occasional -- you know, a lot of the
6 things we were doing in the beginning were
7 the -- just the very big department head
8 cabinet, major ambassadors, and then from there
9 presidential personnel took over after
10 January 20th.

11 BY MS. DELGADO:

12 **Q.** Okay.

13 **A.** And like I said, I mean, in many of
14 these cases, the transition team as a whole, headed
15 up by the vice president, they were the ultimate
16 organizers of the process.

17 **Q.** Uh-hmm. Do you recall the name --
18 actually, let's back up a bit. Could you tell me a
19 bit how the security clearance process worked?

20 **A.** At the White House?

21 **Q.** Yes.

22 **A.** Well, Joe Hagin and Don McGahn and their
23 offices headed up most of that process. It is a --
24 you know, there's a lot of detail to it, but
25 everyone had to fill out a SF 86 form, which is a

1 detailed background check on each individual.

2 And then after that was done, the DOJ
3 and I believe the FBI would review and conduct
4 background checks and investigations on everyone in
5 the White House, and we would occasionally get
6 reports back or no-gos on some people when their
7 reports came back as being problematic.

8 Q. And is it correct that that process took
9 months and most were initially on interim security
10 clearance? And there's a -- let me not compound
11 it. Go ahead and answer that.

12 A. Yeah. I mean, some of them took months
13 and some of them took weeks. I guess it just
14 depended on, you know, the application. There were
15 lots that got -- there were some that got rejected
16 and then there -- in a short period of time, and
17 some, you know, within months, and then some after
18 several months. And at that point I left in the
19 end of July.

20 Q. Fair. Yes.

21 And is it your understanding that in
22 this, what the FBI is looking for mainly are
23 individuals that show, let's say, weaknesses or
24 things in their background that could be
25 susceptible to blackmail?

1 MR. BLUMETTI: Objection to form.

2 THE WITNESS: Yeah, I can't answer to
3 what they look for or what decisions they make
4 or how they make them. It could be a lot of
5 things.

6 BY MS. DELGADO:

7 Q. Are you familiar with the name Tricia --
8 let's see if I pronounce it correctly here, hang on
9 one second -- Tricia Newbold?

10 A. No.

11 Q. Okay. Let me e-mail to the court
12 reporter, if I may, I want to send you something to
13 look at.

14 MS. DELGADO: So this will be Exhibit 4,
15 I think. Okay. Wonderful.

16 (Sharing screen.)

17 (Thereupon, Plaintiff's Exhibit No. 4
18 was marked for identification.)

19 BY MS. DELGADO:

20 Q. So, Mr. Priebus, if you could -- if the
21 court reporter could flip to page 2. Or actually,
22 let's start -- I'm sorry. Start on page 1 because
23 I want to explain what this is.

24 What you're looking at, Mr. Priebus,
25 this is a public document, and it's a memorandum

1 from April 2019 by the Congressional House
2 Committee on Oversight and Reform. And it's the
3 testimony of a Ms. Tricia Newbold, and she's a long
4 time executive branch employee within the federal
5 government, and she works for the personal security
6 office in the White House.

7 And if the court reporter could go to
8 page 2, I'd like you to look at the fourth, that's
9 number 4, full paragraph which starts "Ms. Newbold
10 explained that..." Do you see that?

11 **A.** Yeah, I see it.

12 **Q.** Okay. I'm just going to read aloud into
13 the record. (As read): "And Ms. Newbold explained
14 that starting in 2018 she began to keep a list of
15 the White House employees whose denials were
16 overturned. Her list eventually grew to 25
17 individuals, including two senior White House
18 officials, as well as contractors and individuals
19 throughout different components of the executive
20 office of the President. According to Ms. Newbold,
21 these individuals had a wide range of serious
22 disqualifying issues involving foreign influence,
23 conflicts of interest concerning personal conduct,
24 financial problems, drug use, and criminal
25 conduct."

1 Now, I know she's referencing that she
2 started taking this list in 2018 and that's past
3 your tenure, but some of these -- although she
4 started keeping the list in 2018, some of these are
5 from 2017, 2018, 2019.

6 Does any of that ring a bell to you,
7 what she speaks of?

8 **A.** No.

9 **Q.** So you don't know of any individuals
10 whose White House security clearance was a no go,
11 as you called it earlier, yet they were allowed to
12 work in the White House?

13 **A.** The only one that I thought was having a
14 security clearance issue was Anthony Scaramucci,
15 and I don't know how that ended up. I know there
16 was an issue, but I don't know if it was resolved
17 or what. But that's the only name --

18 **Q.** What was his position?

19 **A.** I don't remember. But I remember there
20 was a holdup, and it may have just been because he
21 had so much -- a lot of financial disclosures to
22 make. So I don't know what the issue was or how it
23 was resolved.

24 There may have been a couple other
25 security clearance issues that were being worked on

1 and discussed by White House counsel. I
2 occasionally had conversations with Don McGahn
3 about where we were at on security clearances, but
4 he was handling it, and we weren't at the point to
5 anything being real problematic until, of course, I
6 left and then I kind of, obviously, had nothing to
7 do with it anymore.

8 Q. Well, we spoke earlier of Raj Shah; do
9 you recall that?

10 A. Yes.

11 Q. Okay. You were aware because he came
12 from your RNC group, right?

13 A. I'm aware of him.

14 Q. Okay. But you said you didn't hire him
15 yourself?

16 A. No.

17 Q. Okay. Were you aware that Mr. Shah
18 was -- had been arrested just a few years earlier
19 in New Mexico for aggravated DWI?

20 A. Not that I recall, no.

21 Q. Was he not submitted to a background
22 check?

23 A. I'm sure he was on his onboarding.

24 Q. So did he not list this on his
25 background check, or...

1 **A.** I don't see everyone's background
2 checks. I mean, they do the background check and
3 the SF 86, the interviews with the DOJ and the FBI
4 overseen by White House counsel and White House
5 operation, so I'm not in the middle of everybody's
6 background checks.

7 **Q.** Because he had a pretty senior role,
8 right, deputy White House press secretary?

9 MR. BLUMETTI: Objection to form.

10 BY MS. DELGADO:

11 **Q.** Isn't that a very senior role?

12 **A.** I don't consider that to be a very
13 senior role, no.

14 **Q.** Okay.

15 **A.** Press secretary is a senior role. Comms
16 director is a senior role. Deputy, no.

17 **Q.** I see. Thank you for explaining how you
18 define "senior role."

19 Now, this comes up in even Google,
20 Mr. Shah, so how were you not aware of this?

21 MR. BLUMETTI: Objection to form.

22 THE WITNESS: I guess I didn't Google
23 it.

24 BY MS. DELGADO:

25 **Q.** But I would think the FBI did. Do you



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1 have any reason to think the FBI didn't do their
2 due diligence on Mr. Shah?

3 **A.** I have no reason to believe they didn't.

4 **Q.** Do you think it's appropriate for
5 someone with a DWI or DUI to work in a White House?

6 MR. BLUMETTI: Object to form.

7 THE WITNESS: I mean, I guess it depends
8 on the situation.

9 BY MS. DELGADO:

10 **Q.** Are you aware of how many individuals,
11 including children, are killed daily through
12 individuals who drive impaired?

13 **A.** Sure. And I think it's terrible.

14 **Q.** But you're okay with someone who
15 committed that offense, working in the highest --?

16 **A.** That got a DUI?

17 **Q.** Hmm-hmm.

18 **A.** You mean like Bush 43?

19 **Q.** He was elected, wasn't he?

20 **A.** Yeah, I know -- whether or not it's
21 disqualifying. It would be up to, you know, the
22 individuals, the situation, the review board, you
23 know, that at the FBI and the DOJ to make that
24 determination, and ultimately, the folks that are
25 doing, you know, the vetting.



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1 Q. Right.

2 So you feel -- something in someone's
3 background isn't automatically disqualifying, that
4 it depends on the context and those doing the
5 investigation; is that correct?

6 A. I think it depends on the investigators
7 and the situation, sure.

8 Q. So an offense where individuals,
9 including children, could have been killed, you
10 don't feel is automatically disqualifying?

11 MR. BLUMETTI: Objection to form.

12 THE WITNESS: I don't know. It just
13 depends on the situation. I mean, if someone
14 had a DUI, you know, years ago and they changed
15 their life and they showed improvement and rehab
16 and they are a different kind of person today
17 than they used to be, then I think it's possible
18 that that person can have a second chance.

19 BY MS. DELGADO:

20 Q. Do you equate a second chance -- do you
21 see a second chance as being distinct from working
22 in the White House?

23 A. I think people could have second
24 chances. And I think everyone could have a second
25 chance in life no matter what's going on. I mean,

1 I guess it depends on how horrible it is. But I
2 mean, I think generally second chances can be
3 appropriate under the right circumstances.

4 Q. So in your opinion, a DUI of Mr. Shah's
5 from just a few years back would not automatically
6 and should not automatically disqualify him from
7 employment in the White House?

8 MR. BLUMETTI: Objection to form.

9 THE WITNESS: It may or may not. I
10 mean, if I would have known about it, maybe it
11 would have.

12 BY MS. DELGADO:

13 Q. So just to be clear, Mr. Shah was hired
14 for the White House despite a DUI a few years
15 earlier, which you claim you weren't aware of, and
16 having referred to the President he will be serving
17 as, quote, a deplorable, according to reports, and
18 the *Access Hollywood* paper release as "justice",
19 according to reports, and having dug up
20 embarrassing footage of the President he is to
21 serve just a year earlier, according to reports,
22 and he was hired for the White House.

23 Is that -- did I get that right? Was
24 anything inaccurate there?

25 A. You'd have to ask -- you'd have to ask



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1 Sean that question. I mean, it's...

2 Q. Sure.

3 And also to be clear, Mr. Shah's -- I
4 want to make sure I'm not missing some Stellar
5 Oxford education or something in his background,
6 his role at the RNC was just opposition research,
7 right?

8 MR. BLUMETTI: Objection to form.

9 THE WITNESS: He was a -- you'd have to
10 ask -- I don't remember his exact title, but he
11 was heading up the research department, which is
12 a communications role at the RNC in the
13 communications shop. He may have been doing --

14 BY MS. DELGADO:

15 Q. Okay. Let's --

16 A. He may have been doing press work as
17 well during the time that he was head of research.

18 Q. Can we talk a bit about Helen Aguirre
19 Ferre? Do you remember Helen?

20 A. No.

21 Q. You don't remember Helen, a Latina woman
22 from Miami?

23 A. What was the last name?

24 Q. Helen Ferre. Ferre, as you would say.

25 A. Yeah. Can you spell it?



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1 Q. F-e-r-r-e.

2 A. I don't.

3 Q. Okay. Does it ring a bell? She
4 referred to Trump as a, quote, street dog and
5 anti-female during the primaries. She worked for
6 the RNC. That's why I'm surprised you don't
7 remember.

8 A. I don't remember. Maybe vaguely. Now
9 you kind of like stirred my memory a little bit.
10 Vaguely.

11 Q. Okay. And I'm happy to show you the
12 article where she referred to Mr. Trump as such,
13 but explain to me, how does someone who referred to
14 Mr. Trump as a "street dog" and as "anti-female"
15 then get a job in the White House?

16 MR. BLUMETTI: Objection to form.

17 THE WITNESS: Because the people doing
18 the hiring decided that she should be hired. I
19 don't know. I don't remember her, and I don't
20 know her.

21 BY MS. DELGADO:

22 Q. Okay. Do you remember Stephanie
23 Grisham?

24 A. I remember who she was after we started
25 in the White House.

1 **Q.** Okay. And, you know, we've been talking
2 about security clearances. I want to show you
3 something else.

4 MS. DELGADO: This will be Exhibit 5.

5 (Thereupon, Plaintiff's Exhibit No. 5
6 was marked for identification.)

7 (Sharing screen.)

8 BY MS. DELGADO:

9 **Q.** Let's see here. Give me one second.

10 I'm sorry. Okay. Okay. And just stop there.

11 Mr. Priebus, that person had what you
12 consider a senior role in the White House, right?

13 **A.** It was -- I think she came in, in the
14 First Lady's office.

15 **Q.** Hmm-hmm. And later became White House
16 press secretary, a cabinet member, correct?

17 MR. BLUMETTI: Objection to form.

18 THE WITNESS: That's not a cabinet
19 member, but --

20 BY MS. DELGADO:

21 **Q.** Oh --

22 **A.** -- she did become press secretary.

23 **Q.** My bad.

24 And also White House comms director?

25 **A.** I believe so. It would have been way



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1 after I left.

2 Q. Sure.

3 But she was working there when you were
4 chief of staff, correct?

5 A. She was a -- what they call a "press
6 wrangler."

7 Q. I have that she was a deputy press
8 secretary. I can send you that --

9 A. I don't know.

10 Q. -- if you'd like.

11 A. I don't know what her title was
12 initially.

13 Q. In fact, she worked right underneath
14 Sean Spicer; is that correct?

15 A. So I think everyone would have worked
16 below Sean Spicer in the comm shop.

17 Q. So if we could go back to the question:
18 How does someone with two arrests, recent ones,
19 including during the campaign, because one is from
20 2015, how does that person pass the vetting?

21 A. You'd have to talk to the DOJ and the
22 FBI.

23 Q. So it appears, based on her passing the
24 vetting, that this was not disqualifying?

25 A. I don't know if she passed the vetting

1 or not.

2 Q. Sure.

3 So it's possible that even if you didn't
4 pass the vetting, you could remain working in the
5 White House, correct?

6 A. No, I don't know the state of her
7 security clearance or when it was cleared or if it
8 was cleared or what the status was of it.

9 Q. Well, she was in the White House four
10 months -- four years, Mr. Priebus?

11 A. Then you could assume that she either
12 got a security clearance or somehow had passed the
13 vetting.

14 Q. So, again, criminal records and DUIs
15 where individuals could be killed were not
16 disqualifying in a Trump administration.

17 MR. BLUMETTI: Objection, form.

18 BY MS. DELGADO:

19 Q. And individuals with such criminal
20 backgrounds worked there while you were chief of
21 staff; is that correct?

22 A. I don't know, because I wasn't -- I
23 don't know what their background is. So you're
24 telling me these things and I don't really know
25 what's true and not, and I don't know what the FBI



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1 and the DOJ were doing or reviewing, so it's hard
2 to answer.

3 **Q.** Were you aware of this?

4 **A.** Was I aware of the deputy press
5 secretary having a DUI in 2013, no.

6 **Q.** What about the DUI in 2015?

7 **A.** No.

8 **Q.** No one brought this to your attention as
9 chief of staff?

10 **A.** No.

11 **Q.** Okay.

12 Would you say a college degree would be
13 necessary for a deputy press role?

14 **A.** Not necessarily.

15 **Q.** And Ms. Grisham, after she left the
16 White House, wrote a best selling book; is that
17 correct? Does that ring a bell?

18 **A.** I remember she wrote a book.

19 **Q.** I'm going to show you, I think,
20 Exhibit 6.

21 (Thereupon, Plaintiff's Exhibit No. 6
22 was marked for identification.)

23 (Sharing screen.)

24 BY MS. DELGADO:

25 **Q.** Okay. Okay. Who is that, Mr. Priebus?



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1 **A.** That looks like Boris.

2 **Q.** Okay. And I don't know if you could
3 read what's on there, but would it be correct to
4 say that's from his arrest?

5 **A.** It looks like it.

6 **Q.** Which was for violent assault?

7 **A.** That's what it says.

8 **Q.** Okay. How does that individual work in
9 your White House?

10 MR. BLUMETTI: Objection to form.

11 BY MS. DELGADO:

12 **Q.** How does -- let me rephrase.

13 How does an individual with a criminal
14 record and a mugshot work in a Reince Priebus led
15 White House?

16 **A.** The people that -- other -- like I said,
17 I'm one of many people that influenced and tried to
18 build a White House staff, cabinet, Trump
19 administration, and there are lots of folks that
20 have influence. And the people that were hired or
21 not hired is a result of many people including
22 department heads and the people that are building
23 their teams and putting together their teams that
24 they want to work with subject to background
25 checks, White House ops, and White House counsel.



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1 **Q.** Sure.

2 But we've heard from your co-defendant a
3 lot about security clearance and vetting and how
4 important that process is in disqualifying
5 candidates, so I guess I'm just asking how is it
6 you have Raj Shah, Stephanie Grisham, Boris
7 Epshteyn, all criminal records, this isn't just
8 something embarrassing, but criminal, DUIs that can
9 kill people, how do they -- do you have any idea
10 how they passed the vetting, but Mr. Spicer says I
11 wouldn't? I'm asking you if you know why they are
12 unique or special?

13 **A.** I just answered it. Because there are a
14 lot of people making hiring decisions and there's a
15 lot of people that -- that worked together to try
16 to build the staff and the teams that ultimately
17 got to the White House and they got there.

18 **Q.** Again, I don't think that's actually
19 answering my question, though, to how -- that's not
20 about why they were hired. I understand that's
21 what you're answering.

22 How do they pass security vetting, in
23 your opinion?

24 **A.** You'd have to ask the DOJ and the FBI.
25 I am not part of the vetting process when it comes

1 to national security and vetting by the DOJ and the
2 FBI. They come back with their results and either
3 they get an up or down result or it goes for
4 further review.

5 By the time I left the White House,
6 99 percent of these matters were still being
7 reviewed. So Don McGahn was dealing with all of
8 this and everyone coming in the White House was
9 subject to vetting, review, and a security
10 background check, and that was the process.

11 Q. Fair enough.

12 So would you say -- you said when you
13 left 99 percent of these were still in the pipeline
14 as they were, which that makes pass.

15 A. I don't -- I misspoke. I don't know
16 what percentage were in the pipeline. There were
17 lots in the pipeline. Don McGahn. Another guy,
18 his last name was Karrol, who was in charge of all
19 of the vetting and all the reviews of every
20 employee was working on these matters. If someone
21 was problematic and it was someone that was being
22 asked to leave based on a background check, they
23 would handle it.

24 Q. And you said when an individual would
25 receive an up or down, it would then -- it

1 occasionally or always or sometimes be subjected to
2 further review?

3 **A.** Sometimes I believe it went to further
4 review through the FBI and the DOJ, and sometimes
5 people got a thumbs down pretty quickly, and by the
6 time, you know, this stuff came to a head, I was
7 gone.

8 **Q.** So you weren't aware of Boris' arrest
9 and criminal past?

10 **A.** No.

11 **Q.** Who hired Boris?

12 **A.** It would have been through the press
13 shop.

14 **Q.** He worked, okay, for surrogate
15 operations. So that would have been Sean hired
16 him?

17 **A.** I would assume so.

18 **Q.** So would Sean have likely known about
19 this arrest?

20 **A.** I have no idea.

21 **Q.** Well, what's the date on that article?

22 **A.** The article is the 17th of -- or
23 March 10th, 2017.

24 **Q.** Okay. I'm going to circle back with
25 another article about that, but I don't want to

1 hold this up on the exhibits, so we'll circle back
2 to that.

3 Were you aware Boris was arrested a
4 couple years ago for groping a woman or women,
5 allegedly, in a bar?

6 **A.** I may have heard it, but I didn't pay
7 attention to it.

8 **Q.** Does the name Max Miller ring a bell?

9 **A.** Yes.

10 **Q.** And he served in the White House when
11 you were there, right?

12 **A.** I think so.

13 **Q.** Did Max have a criminal record?

14 **A.** I don't remember him particularly,
15 maybe. I mean, I know who he was, but I don't
16 remember at the time working with him, or I don't
17 remember much of him.

18 **Q.** Okay. I could -- I can just slow things
19 down with another exhibit or I can tell you that he
20 had a criminal record including charges of assault,
21 disorderly conduct, and resisting arrest prior to
22 the White House.

23 So same question, how does an individual
24 like Max Miller pass vetting?

25 **A.** You have to ask the people doing the

1 vetting.

2 Q. Right.

3 A. So when people get a job in the White
4 House, the first thing they do, one of the first
5 things is they go to be vetted. They go to White
6 House operations. They fill out all their personal
7 information about themselves. It's like, you know,
8 75 pages of background that then gets reviewed by
9 White House counsel, the DOJ, and the FBI.

10 We don't have -- you know, that is the
11 vetting of the White House. And as matters come
12 up, the White House counsel works through those
13 issues with each person or with the FBI, and at
14 some point either someone has a security clearance
15 and they pass or they don't. That's how it works.

16 Q. So if Sean Spicer stated that I wouldn't
17 have passed security clearance, you disagree with
18 that because your position is, that's not a
19 determination we made; that's up to the FBI and the
20 DOJ and the folks who do that, correct?

21 A. I didn't make the determination as to
22 whether you had passed or not, right? You know, so
23 I don't -- I don't know enough about you to even
24 have an opinion.

25 Q. So when I asked you your opinion on the



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1 others, you said you can't give an opinion because
2 that wasn't your role or your wheelhouse. So how
3 would you have an opinion on mine? How does Sean?

4 **A.** I don't have an opinion on yours. I
5 mean, I don't know anything about you.

6 **Q.** Can we talk about John McEntee?

7 **A.** Sure.

8 **Q.** That's another one who was in the White
9 House for over a year before the security clearance
10 issues of his came to light, correct?

11 MR. BLUMETTI: Object to form.

12 THE WITNESS: I don't know.

13 BY MS. DELGADO:

14 **Q.** I can show you an article, if you'd
15 like, to refresh your recollection that he departed
16 in March of 2018 after serving 15 months in the
17 White House.

18 So my question is, weren't there also
19 individuals who despite having questionable issues
20 that, in McEntee's case, could subject them to
21 blackmail, that being extreme gambling issues,
22 nonetheless, were able to serve in the White House
23 because it did take so long for these vettings, in
24 some cases, to be completed? Is that accurate?

25 And I can show the article if you'd like



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1 so that you don't have to take --

2 **A.** No, I'm -- I'm aware of the general
3 incident, so I don't question that. I just -- the
4 DOJ and the FBI are the ones that are -- and the
5 White House counsel are the folks that are doing
6 and conducting these background checks, so I'm not
7 the expert to answer your questions as far as what
8 the process is, how it works, how long, you know.
9 I'm just not an expert on that particular process.

10 **Q.** Fair enough. Fair enough.

11 Bear with me here. One more exhibit, I
12 mean. Okay.

13 (Thereupon, Plaintiff's Exhibit No. 7
14 was marked for identification.)

15 MS. DELGADO: These are three
16 exhibits I'm sending. Well, 12, is it?
17 Sorry, one of my clocks, I never
18 changed it.

19 (Sharing screen.)

20 BY MS. DELGADO:

21 **Q.** Okay. So this is a headline from *Slate*
22 from February 2018 and it talks about the year
23 2017. And I hope you can see the headline. I'll
24 read it into the record. It says, "Rob Porter's
25 history of domestic abuse wasn't a secret. It's



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1 just that no one cared."

2 The cops, the FBI, and the White House
3 chief of staff all knew, and he still continued to
4 rise through the ranks of our government's highest
5 office. Have you seen this article, Mr. Priebus?

6 **A.** No. No.

7 **Q.** It mentions you by name and never -- no
8 one ever showed it to you? It didn't come up on
9 your Google alerts, nothing?

10 **A.** It mentions my name?

11 **Q.** I believe so, yes.

12 **A.** Where?

13 **Q.** Let's see. I'm trying to bring up the
14 link. It might be in a separate article.
15 Actually, it's not this article that mentions you.
16 I apologize. I take that back. It's the other
17 one, and I didn't link that one. So never mind
18 that question.

19 Did you know about Rob Porter's history
20 of domestic abuse?

21 **A.** No.

22 **Q.** When did you become aware? Now?

23 **A.** When it -- when it came out in the
24 press. When it exploded in the press.

25 **Q.** And to make sure we both heard the same

1 thing and we were both aware of the same thing,
2 two, not just just one, of his ex-wives claimed
3 that he was physically abusive. And if the court
4 reporter could kindly throw up on the screen
5 exhibit -- the third exhibit I sent. We'll mark
6 that as Exhibit 8.

9 (Sharing screen.)

10 BY MS. DELGADO:

11 **Q.** So according to one of Rob Porter's
12 ex-wives, we have up on the screen a picture, a
13 photo of a Ms. Colbie Holderness. She was Rob
14 Porter's first wife who claims she was a victim of
15 his beating. Rob Porter --

16 Well, let me just ask you: Have you
17 seen this photo before, Mr. Priebus?

18 A. NO.

Q. Okay. Were you --

20 **A.** I've seen similar pictures in other
21 publications. I don't know about this one, but,
22 you know, I'm aware of this story.

23 **Q.** Okay. So you're aware that two ex-wives
24 spoke to the FBI when he was hired about --

A. I don't know --

1 Q. -- 2000 --

2 A. I don't know when they spoke to the FBI,
3 but...

4 Q. That they claim they did. I should
5 rephrase that.

6 A. Yeah, and I don't -- and I don't know
7 when. I think this story broke out sometime after
8 I left, maybe a couple years after I left.

9 Q. They broke out in February of 2018.

10 A. Okay. Well --

11 Q. It was after you left, but it concerns
12 the period when you were there because they spoke
13 to the FBI.

14 A. No, it doesn't -- it doesn't concern the
15 period when I was there. It's just that the
16 security clearance issues started when I was there.
17 They just didn't conclude when I was there.

18 Q. Correct. Absolutely. Fair enough.

19 (Thereupon, Plaintiff's Exhibit No. 9
20 was marked for identification.)

21 (Sharing screen.)

22 BY MS. DELGADO:

23 Q. But how is it Mr. Porter was even
24 through your tenure working under you? And our
25 next exhibit is a photo of you in the West Wing and



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1 oval office, you and Mr. Porter with Mr. Trump.

2 How did Mr. Porter manage to work in the
3 White House for a year and change, including all
4 seven months of your tenure, with that in his
5 background?

6 MR. BLUMETTI: Objection to form.

7 THE WITNESS: Because the people doing
8 the background checks and the reviews don't
9 conclude their reviews immediately. And I
10 didn't know about it, and I don't -- I don't
11 think anyone knew about it. So it was a shock
12 to a lot of people, and after they apparently
13 heard the reports, after the DOJ and FBI went
14 through, you know, domestic files in the
15 counties in Virginia, maybe that's how they
16 found it. But certainly wasn't anything anyone
17 else knew about.

18 MS. DELGADO: And that's the Exhibit 9
19 there, the photo.

20 BY MS. DELGADO:

21 Q. So to make sure I understand what you
22 just said correctly, you once again, as you alluded
23 to and specifically mentioned earlier, these
24 background checks can sometimes take a very long
25 time, is what you're saying?

A. Yes.

Q. Fair enough.

3 And even though Rob Porter had a
4 domestic violence restraining order, which was made
5 aware to the FBI early on when he was hired,
6 allegedly by the ex-wife who obtained the
7 restraining order, it nonetheless appears to have
8 taken over a year, including after you were gone,
9 to investigate this; is that correct?

10 **A.** Yeah, I don't -- I don't know what steps
11 were taken in dealing with the security clearance
12 issues, but almost none of the issues that were
13 pending were resolved or coming to the conclusion
14 of being resolved before I actually left. So White
15 House counsel --

16 **Q.** So no one ever -- oh, I'm sorry. Go
17 ahead.

18 **A.** -- White House counsel and the folks
19 there in operations would be the people who would
20 know the ins and outs of what the DOJ and the FBI
21 was doing in regard to these background checks.
22 And the people that came after me would know maybe
23 to the point where they were being briefed on where
24 these different issues where at.

25 Q. Fair enough.

1 It wasn't brought to your attention
2 during your seven-month tenure --

3 **A.** No.

4 **Q.** -- is that correct?

5 **A.** That's right.

6 **Q.** Do you believe it was brought to Don
7 McGahn's attention?

8 **A.** I don't know if it was or not.

9 **Q.** Do you believe --

10 **A.** It would have been someone in his
11 office.

12 **Q.** Uh-hmm. Do you believe it would have
13 been brought to Hope Hicks' attention, or was?

14 MR. BLUMETTI: Objection.

15 THE WITNESS: I have no idea.

16 BY MS. DELGADO:

17 **Q.** Do you feel it strains -- do you feel
18 it's a stretch that it would take a year and two
19 months to adjudicate the security clearance of
20 someone who allegedly beat up a wife pretty badly?
21 In your opinion, why would that take a year and two
22 months?

23 MR. BLUMETTI: Objection to form.

24 THE WITNESS: I have no idea.

25 BY MS. DELGADO:



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1 Q. No idea.

2 Do you believe that Trump --

3 A. It seems like a long time. It seems
4 like a long time, but I have no idea.

5 Q. Mr. Porter had a Harvard law degree, did
6 he not?

7 A. I believe that he did.

8 Q. In your experience with Mr. Trump and
9 his constant boasting of his Wharton degree and of
10 others' Ivy League credentials, would it be fair to
11 say Mr. Trump places a premium on that?

12 MR. BLUMETTI: Object to the form.

13 MS. DELGADO: I'm asking for his
14 opinions.

15 THE WITNESS: I mean, perhaps. I mean, I
16 went to the University of Wisconsin at
17 Whitewater, so not exactly Harvard.

18 BY MS. DELGADO:

19 Q. Hey, that's okay. That's okay.

20 I'm just asking you -- I'm just asking
21 about Mr. Trump.

22 A. And the University of Miami in Florida,
23 so that wasn't bad.

24 Q. I'm just asking about Mr. Trump's
25 perception, not saying it's correct or not.

1 **A.** Yeah, I mean, sure. I mean, I don't
2 know. It certainly wouldn't be a defining item for
3 somebody, but it couldn't hurt.

4 **Q.** And I will -- I'll spare you if you're
5 okay with my not having to show it, to not slow
6 things down because we're close to being done, but
7 there's a *Wall Street Journal* article about Rob
8 Porter and this situation where it's reported that
9 in early 2017 this was brought to Don McGahn's
10 attention.

11 So, again, if your answer is "I don't
12 know," that's fine. But I have to ask: Any clue
13 why it took over a year for that security -- why he
14 was allowed to work in the West Wing with an
15 interim security clearance?

16 First of all, let me just ask you that.
17 How was he allowed to work in the West Wing in the
18 oval office when you were chief of staff with an
19 interim security clearance?

20 **A.** You'd have to ask the people that
21 understand how interim security clearances work. I
22 think it's a specific -- there's a specific way
23 that that is done and reviewed. But no one ever
24 brought to the attention of me, or I would highly
25 doubt anyone even remotely around me, about the

1 fact that there was some kind of domestic abuse
2 accusation against Rob Porter. The first I heard
3 of it was when it blew up in the West Wing and that
4 was it.

5 Q. So individuals were able -- Rob Porter
6 being at least one example, were able to work in
7 the White House for months, even a year or longer
8 with interim security clearances; is that correct?

9 A. You'd have to find out what the level of
10 their clearance was. I mean, it isn't -- it's
11 handled by the FBI and the DOJ and the White House
12 counsel's office. It's not -- there's a specific
13 process that I think is, you know, detailed,
14 specific step-by-step method that they use, and I'm
15 not the person to be able to explain to you how
16 temporary security clearances work.

17 Q. Right. Yeah, and I don't want you to
18 explain it. I know that's a detailed request. I
19 wouldn't make that of you.

20 It's just, were you aware of individuals
21 with interim security clearances working in the
22 West Wing or in the White House overall?

23 A. Well, I was one.

24 Q. You were one. Oh, okay.

25 Okay. How long was it --



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1 **A.** I mean, I think -- I mean, it's -- I
2 think -- I mean, I was probably a few months. I
3 mean, it takes a few months before you get your
4 permanent.

5 **Q.** Sure, sure, and that makes sense.

6 And so I guess that circles back to what
7 we were saying, using Boris as an example. What I
8 was asking about that is, sometimes then even just
9 being in the White House, as Boris was able to
10 parlay into a lucrative and prestigious
11 communications role, even if you're going to fail
12 your security clearance, some individuals snuck in
13 there for a while, didn't they, like Porter?

14 MR. BLUMETTI: Objection to form.

15 THE WITNESS: I suppose.

16 BY MS. DELGADO:

17 **Q.** Okay. Do you believe the Trump
18 administration -- this is just your personal
19 opinion -- do you believe Mr. Trump -- I'll limit
20 it to Mr. Trump at first, do you believe Mr. Trump
21 cares about domestic violence?

22 **A.** Yeah, I think so.

23 **Q.** Why is it then that when Porter, this
24 all came out, he nonetheless spoke highly of Rob
25 Porter?

1 **A.** I have no idea. You got to ask him. I
2 wasn't even there.

3 **Q.** Do you have any reason or information or
4 understanding of why Mr. Trump keeps Jason Miller
5 in his orbit despite the allegations of Jason
6 Miller having been physically and sexually abusive
7 with me?

8 **A.** I don't know. You're going to have to
9 ask the President.

10 **Q.** Okay. Maybe I will.

11 Okay. Let's see. I think we're close
12 to being done, but -- well, on the -- on the
13 security clearances, just again if you don't know,
14 because I'm asking you about someone else's
15 testimony, but do you have any reason to believe or
16 understand why Mr. Spicer was so adamant that I
17 wouldn't have been able to work in the White House
18 due to security clearance, but someone like Rob
19 Porter did for a year and change? Any idea why?

20 **A.** I don't know what the differences are or
21 the details or the distinguishing reasons. You
22 have to ask Sean, I mean.

23 **Q.** Was there a different standard for
24 women?

25 MR. BLUMETTI: Object to form.

1 THE WITNESS: No. Everyone had to fill
2 out the same stuff no matter who you were.

3 BY MS. DELGADO:

4 Q. Right.

5 But when stuff, as when the SP 86 came
6 back with something eh, was there a different
7 standard for women or for Hispanics or for any
8 category --

9 A. No.

10 Q. -- based on whether it was a problem or
11 not?

12 A. No, of course not.

13 Q. You have no reason -- your belief is
14 that everyone was treated the same when it came to
15 security clearance?

16 A. Yeah. Yes.

17 Q. You don't believe Rob Porter -- okay.

18 Okay. Fair enough.

19 A. If I -- listen, we got people like --
20 you know, that we are dealing with that came well
21 after me.

22 Q. Right. But it was brought to Don
23 McGahn's attention, the security clearance of Rob
24 Porter began while you were chief of staff.

25 A. I don't know if that's true or not. I



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1 don't know that. You've got to ask Don McGahn when
2 the date was. I mean, you could --

3 Q. Oh, no, that's what we're here to do.

4 I'm asking you if you were aware of it, and you've
5 testified that you were not aware --

6 A. No.

7 Q. -- of any allegations. That possibly
8 Don McGahn was, but you yourself was not.

9 A. I don't know what Don McGahn knew or
10 when he knew it, and I know I was not aware of it
11 until it exploded in the press.

12 Q. So you have no reason to believe that my
13 security clearance would have been treated any
14 differently than anyone else's?

15 A. I think your security clearance would
16 have been treated the same, and I don't know how it
17 would have turned out because I don't know anything
18 about your background, and I don't -- I'm not an
19 expert at understanding how that process works.

20 Q. And two individuals who were,
21 quote-unquote, if I may use the term "shown the
22 door" over security clearances that I found, one
23 was Justin Caporale; is that correct?

24 A. I know -- I know of him, but I didn't
25 realize that he was released because of security



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1 clearance.

2 **Q.** I believe it was in one of the books by
3 someone who served with him and what was reported
4 in the book, if I recall correctly -- and please
5 let me know if this rings a bell, this is why I'm
6 asking, is it -- was because it was the kind of
7 thing that -- that made someone susceptible to
8 blackmail, and that was that he had a secret
9 profile on Grindr? Does that ring a bell?

10 **A.** That doesn't ring any bell.

11 **Q.** Okay. And the other who was let go was
12 the daughter of Susie Wiles, who currently runs the
13 campaign, Caroline Wiles, and that was for drug
14 use, which the FBI also feels leads to potential
15 for blackmail. Does that ring a bell?

16 **A.** A little bit.

17 **Q.** Uh-hmm. Do you remember Lynne Patton,
18 who was Eric Trump's wedding planner, getting a job
19 in the administration?

20 **A.** I don't remember her getting -- well,
21 maybe in some other department, maybe like in
22 another like cabinet type of post. Or not a
23 cabinet position, but working for a cabinet
24 secretary somewhere, I have a recollection of that.
25 I just can't remember exactly who.



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1 **Q.** Yeah, I believe it was running HUD, the
2 housing authority. Does that ring a bell?

3 **A.** It rings a bell.

4 **Q.** So how does someone whose background is
5 as a wedding planner get a job in the Trump
6 administration? Any thoughts?

7 **A.** I don't know. I mean, you know, there's
8 thousands of jobs. I mean, I don't know what to
9 tell you. I don't know. Nothing that --

10 **Q.** And you have no reason to think I
11 wouldn't have qualified for at least one of those,
12 right?

13 **A.** It's up to you. I mean, I'm not sure
14 what all you applied for. I don't know.

15 **Q.** Wouldn't you say at the end of the day a
16 lot of these jobs, and perhaps that's true in all
17 administrations, but I think particularly the way
18 Mr. Trump operates, came down to whether Mr. Trump
19 and the Trump family liked you; is that accurate?

20 **A.** I don't think that that's always
21 accurate. I mean, I just -- there are thousands
22 and thousands of jobs, and presidential personnel
23 vets everybody and tries to match people up for
24 what's needed and who people want and who people
25 want to hire. I think there's a lot of

1 personalities and opinions that go into it.

2 Q. Sure. And obviously, with thousands of
3 jobs, they're not going to know even a fraction of
4 that. If I could restate it then.

5 Does knowing the Trump family and being
6 well liked by Mr. Trump help in obtaining a White
7 House job?

8 MR. BLUMETTI: Objection to form.

9 THE WITNESS: I mean, being liked
10 certainly helps.

11 BY MS. DELGADO:

12 Q. Right. Okay.

13 A. I mean -- I mean, being disliked can't
14 help, I mean, obviously.

15 Q. Well, wasn't Boris hired, who was widely
16 disliked?

17 A. Oh, I don't know. I didn't pick that
18 up. You-all knew far more on the ins and outs and
19 the personalities of the campaign than we did.

20 Q. Okay. I have one more thing to show
21 you, which I didn't plan on using, but something
22 you said, I should use that as an exhibit and ask
23 about it.

24 If you'd like to take the time now to
25 talk to Mr. Blumetti about the Boris issue, I



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1 believe it was.

2 **A.** Yeah.

3 **Q.** If you're able to share or detail what
4 the privilege is there or the confidentiality is
5 there while I get this exhibit ready, that way we
6 can speed things along and close to being done.

7 **A.** All right. Let me put myself on mute,
8 and I'll give you a call.

9 **Q.** Yes. Be sure to put me on mute. I
10 don't need to hear it.

11 (At this time a recess was taken.)

12 THE STENOGRAPHER: Okay. Back on the
13 record.

14 (Thereupon, Plaintiff's Exhibit No.
15 10 was marked for identification.)

16 THE STENOGRAPHER: Did you want to
17 share that e-mail?

18 MS. DELGADO: Yes.

19 BY MS. DELGADO:

20 **Q.** Let me preface it first.

21 Mr. Priebus, you said something earlier,
22 and this is the whole point of depositions, is to
23 learn, that you had heard that Hope Hicks, and I
24 wrote down what you said here, you said, "Someone
25 told me Hope Hicks had said she wouldn't have gone

1 in if you went in;" is that correct?

2 **A.** Yeah, I don't know when I heard it. If
3 it was before or after during the transition, I
4 don't know, or afterwards, or if Sean told me that,
5 I don't know.

6 Q. And who said that?

7 **A.** I don't remember who said it. I just
8 heard that from somewhere.

9 Q. Okay. If we could show the attached.

10 (Sharing screen.)

11 BY MS. DELGADO:

12 **Q.** It's a screenshot that I sent the court
13 reporter of a book -- is what you'll see, of a book
14 written by Hope's former paramour, Corey
15 Lewandowski and Dave Bossie. And I've
16 highlighted -- there are some words highlighted
17 there.

18 And what that is -- what you're looking
19 at is a synopsis of an event where -- let me just
20 read it out loud. "AJ stepped in between Mr. Trump
21 and the reporter and told the reporter that she
22 couldn't interview the candidate. The boss didn't
23 know what was on going on and neither did Hope or
24 Keith, who had moved Mr. Trump away. A heated
25 discussion ensued between AJ and the reporter.

1 Once things went sideways, we didn't do the
2 interview and instead headed straight to the
3 airplane."

4 MS. DELGADO: Okay. You can remove that
5 one.

6 BY MS. DELGADO:

7 Q. So as you can see, it's an excerpt
8 that's not particularly favorable to me. Do you
9 have or have you heard anything about excerpts in
10 books being written or anyone being encouraged to
11 write any false stories about me or portray me in
12 any false light?

13 A. No.

14 Q. No.

15 Even though Mr. Trump was upset about
16 what you heard him describe as a frivolous lawsuit
17 back in 2017?

18 A. No, I've never heard any such
19 instruction like that.

20 Q. Even if there weren't an instruction,
21 have you heard of anyone saying anything about me
22 that was untrue in the public domain or private?

23 MR. BLUMETTI: Objection to form.

24 THE WITNESS: No, not particularly.

25 BY MS. DELGADO:



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1 **Q.** When you say "not particularly," what do
2 you mean?

3 **A.** I guess I don't understand your
4 question. You asked me if I've heard of people
5 being encouraged to say and write things negatively
6 about you, and the answer is no.

7 **Q.** And anything that has been said about me
8 that you later learned was untrue?

9 **A.** No.

10 **Q.** Okay. I want to show you an example,
11 particularly your having brought up Ms. Hicks. You
12 just read what was said by Mr. Lewandowski
13 describing an event I attended with Ms. Hicks,
14 correct? Which said that I --

15 **A.** I don't know if I --

16 MR. BLUMETTI: We believe so. We didn't
17 see anything but the excerpt.

18 BY MS. DELGADO:

19 **Q.** Yes. I'm sorry. I'm representing, if
20 that's okay. If you don't object, I'm representing
21 that it's an excerpt from Mr. Lewandowski and
22 Mr. Bossie's book, Let Trump --

23 MR. BLUMETTI: What is it called?

24 MS. DELGADO: It's called "Let Trump be
25 Trump."



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1 MR. BLUMETTI: Okay.

2 MS. DELGADO: Okay?

3 BY MS. DELGADO:

4 Q. And as you saw, the excerpt says that I
5 stepped in, prevented Mr. Trump from speaking with
6 a reporter, and that I then it says I got into a
7 heated discussion with the reporter. And the
8 reporter they are referencing there, by the way,
9 was this reporter you'll see here, who's now in
10 Congress, and it was an event at the Bay of Pigs
11 Museum in Miami.

12 Now I'm going to show you a YouTube
13 clip --

14 MS. DELGADO: If you could play the
15 clip, please.

16 BY MS. DELGADO:

17 Q. -- of that exact moment being described
18 in the book.

19 (Sharing screen.)

20 MS. DELGADO: And if you could
21 fast-forward, court reporter, to the 50 second,
22 that refers to the moment --

23 MR. BLUMETTI: That's it.

24 MS. DELGADO: -- that was purportedly
25 described in a book excerpt.



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1 To the 50 second mark. Thank you.

2 Yeah, anywhere around there is good.

3 (YouTube video playing.)

4 BY MS. DELGADO:

5 Q. That's the reporter and that's
6 Mr. Trump.

7 VIDEO: "That I was thanking him, I
8 should say, that he was taking this time to talk
9 to Hispanic media."

10 BY MS. DELGADO:

11 Q. There's Hope Hicks.

12 VIDEO: "Remember, Mr. O'Reilly, that
13 he had not -- "

14 BY MS. DELGADO:

15 Q. That's me with the blonde hair in the
16 white dress.

17 VIDEO: " -- spoken to any Spanish
18 network ever since he became the nominee, so it
19 was the first time that he was -- "

20 BY MS. DELGADO:

21 Q. You saw Ms. Hicks interfere, the
22 reporter pulled back --

23 VIDEO: " -- going to talk to us and we
24 were eager to hear him directly without any
25 filters."

1 "And there he goes, and yeah, why then
2 all of a sudden he leaves."

3 BY MS. DELGADO:

4 **Q.** -- and definitely quietly walks away and
5 follow Mr. Trump.

6 In that video do you see me engage in a
7 heated altercation with the reporter?

8 MR. BLUMETTI: Objection. Let the video
9 speak for itself.

10 MS. DELGADO: Well, I'm asking what he
11 saw.

12 THE WITNESS: I mean, it didn't appear
13 so, but I don't know what's going on before that
14 clip.

15 BY MS. DELGADO:

16 **Q.** Did I interfere to prevent an interview?

17 **A.** I don't know. I don't know. I don't
18 know what was going on.

19 **Q.** Did you see me interfere between the
20 reporter and Mr. Trump in that clip?

21 **A.** Can you play it again?

22 **Q.** Sure.

23 (Playing YouTube video.)

24 VIDEO: "Walking and was explaining
25 to him that I was thanking him, I

1 should say, that he was taking this
2 time to -- "

3 BY MS. DELGADO:

4 **Q.** Ms. Hicks --

5 " -- talk to Hispanic media.

6 Remember, Mr. O'Reilly, that he..."

7 THE WITNESS: I don't know what
8 you're -- he looks like he was looking
9 towards you initially, but you're in a
10 Screenshot, so I don't know what was
11 going on.

12 BY MS. DELGADO:

13 **Q.** Correct.

14 So you don't -- there's no interference
15 from me that you see on there, at least?

16 **A.** Not that I see on the clip, but you're
17 not in the whole clip, and I don't know what's
18 going on before the clip.

19 **Q.** Fair enough. I'm not --

20 **A.** I think it's unclear.

21 **Q.** I can't show the entire day.

22 **A.** What's that?

23 **Q.** I'm not showing you the entire day.

24 Fair enough.

25 Let's just look in the clip, which is



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1 what Ms. Salazar felt was the relevant clip of the
2 incident that she took offense to. I'm just
3 showing you what she took to the O'Reilly Factor.
4 I don't have --

5 **A.** No, I --

6 **Q.** -- the entire --

7 **A.** -- I'm not familiar with it.

8 Is that what -- is that what that
9 overall interview is about?

10 **Q.** That's what the book expert is about, so
11 I show you that simply as an example if it would
12 refresh your memory of any sort of encouragement or
13 influencing or request or pervasive pattern or
14 non-pervasive pattern of anyone in Trump world
15 friendly to the campaign or friendly to Mr. Trump
16 or friendly to Ms. Hicks portraying me in a false
17 light publicly. That's the reason I showed it to
18 you, to ask if that helps refresh your memory.

19 **A.** Not particularly -- no, it doesn't
20 refresh any memory.

21 **Q.** Fair enough. I just had to ask since
22 you mentioned Ms. Hicks.

23 And I would also like to put into the
24 record the article you mentioned, since we did
25 mention it, just to be extra organized. The

1 article about Ms. Hicks' screaming match with
2 Mr. Lewandowski. So I'm just going to send that to
3 the court reporter. That's a May 19th, 2016
4 article.

5 MS. DELGADO: If we could just -- here,
6 I just sent it to you. We could just insert
7 that as an exhibit, even though the question --
8 that was already referenced.

11 BY MS. DELGADO

12 **Q.** Okay. Did you have a chance to discuss
13 with your counsel about Boris?

14 **A.** Yeah. And I can't really -- I'm subject
15 to confidentiality, and so I'm not able to go any
16 further.

17 **Q.** Okay. What's the confidentiality that
18 you're subject to? I need to know the basis, as
19 I'm sure Mr. Blumetti understands.

20 MR. BLUMETTI: You can answer, Reince.
21 It's also privileged.

22 THE WITNESS: I think it's a privileged
23 communication between me and White House
24 counsel, and that's about it.

25 BY MS. DELGADO:

1 **Q.** I'm not requesting the communication
2 between you and White House counsel, though. I'm
3 requesting what were the circumstances under which
4 Boris left. I don't want to know about your
5 communication.

6 MR. BLUMETTI: Which was learned during
7 the communications with counsel.

8 MS. DELGADO: I'm sorry. Can you say
9 that again?

10 MR. BLUMETTI: Which was learned during
11 the communications with counsel.

12 MS. DELGADO: So your position is that
13 Mr. Priebus learned of the circumstances
14 involving Boris via communications with counsel?

15 THE WITNESS: Yes.

16 BY MS. DELGADO:

17 **Q.** Sorry?

18 **A.** Yes.

19 MS. DELGADO: I don't see how that's
20 privileged, the fact that that's how he learned
21 of it. He's not seeking legal advice. It came
22 up in the course of communications with counsel
23 and does not make that itself attorney-client
24 privilege. Unless Boris was thinking of suing
25 him.



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1 MR. BLUMETTI: That's a very narrow view
2 of the attorney-client privilege. Mr. Priebus
3 can't answer the question.

4 BY MS. DELGADO:

5 Q. Are you going to put forth some sort of
6 Privilege Log or --

7 MR. BLUMETTI: I'm sorry. A Privilege
8 Log? It was -- I understood it to be a verbal
9 conversation.

10 MS. DELGADO: Because I can request --
11 oh, it's --

12 BY MS. DELGADO:

13 Q. I thought you said it was an e-mail?

14 A. No, it was a -- it was an oral
15 communication.

16 Q. So it came up in the context of a
17 communication with White House counsel. Which
18 White House counsel?

19 A. Mr. Karrol.

20 Q. Mr. who?

21 A. Karrol, K-A-R-R-O-L.

22 Q. K-A-R-R-O-L.

23 What's the first name?

24 A. Jim.

25 Q. Jim Karrol.



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1 MS. DELGADO: I'll have to take that up
2 with the judge because I don't see how -- unless
3 Mr. Epshteyn was looking to file something
4 against you or the circumstances -- I'm not
5 asking for the communication itself. The fact
6 that they came out in your -- in an e-mail or in
7 a verbal communication does not in and of itself
8 mean that the entire situation is confidential
9 or subject to attorney-client privilege, and
10 it's a matter of public -- especially with a
11 public official in the White House.

12 So, okay, we can table that. I'll have
13 to do a motion about that.

14 BY MS. DELGADO:

15 Q. And when was this communication?

16 A. I don't remember. Probably March 2017.

17 Q. And as a result of what emerged in that
18 communication, Mr. Epshteyn was asked to leave the
19 White House?

20 THE WITNESS: Jared, can I answer that?

21 MR. BLUMETTI: To the extent it's going
22 to be put before the judge, we'll let you
23 just -- we can raise it then.

24 MS. DELGADO: No. That's -- no, that's
25 not privileged, and you really can't make a good



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1 faith basis claim that that, too, is privileged.

2 MR. BLUMETTI: I'm sorry. Can you
3 repeat the question?

4 MS. DELGADO: I'm sorry?

5 MR. BLUMETTI: Could you just -- you or
6 the reporter, could you repeat the question?

7 MS. DELGADO: You said -- are you
8 talking to the court reporter, you said "the
9 reporter"?

10 THE STENOGRAPHER: He said "you or the
11 reporter." I can read it back.

12 (Thereupon, the question read back as
13 requested.)

14 MR. BLUMETTI: I think you can answer
15 that, Reince.

16 THE WITNESS: Yes.

17 BY MS. DELGADO:

18 Q. Okay. Let's see.

19 Mr. Priebus, were you aware of any
20 concerning background information on Mr. Miller's
21 background, and I don't mean the SP 86 because he
22 obviously didn't fill one out, but anything in
23 Mr. Miller's background that you've heard of during
24 that time or since then at any point?

25 A. During that time, no, but since then



1 there's been plenty in the public domain.

2 Q. Such as?

3 A. There was a lawsuit in Orlando. There's
4 a -- that was publicly part of some kind of
5 press -- some press stories, some kind of issues
6 that were reported there. That's about it. Some,
7 you know, personal issues that I've seen in the
8 press.

9 Q. Anything you've heard privately that's
10 not in the press?

11 A. No. I mean, other than just reiterating
12 what's in the press.

13 Q. So I take it you've read about
14 Mr. Miller's admission to the use of prostitutes
15 and his visiting Asian-themed massaged parlors for
16 sexual favors; does that ring a bell?

17 MR. BLUMETTI: Object to form.

18 THE WITNESS: Say that again.

19 BY MS. DELGADO:

20 Q. Have you read any reports about
21 Mr. Miller's admission to use in hiring of
22 prostitutes?

23 A. I don't know if I've read that he's
24 admitted to that or that it's true or not, but I --
25 I recall seeing allegations that sound similar to



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1 those sorts of things.

2 Q. Have you read the reports of
3 Mr. Miller's admission to visiting what you refer
4 to as Asian-themed massage parlors in various
5 cities for sexual favors?

6 MR. BLUMETTI: Objection to form.

7 THE WITNESS: I don't know about the
8 favors part, but I've read or seen reports of
9 those sorts of things involving him, but what's
10 true and what's not, I don't know.

11 BY MS. DELGADO:

12 Q. Do you believe it was -- it would have
13 been appropriate to hire Mr. Miller given his
14 personal conduct failings?

15 MR. BLUMETTI: Objection to form.

16 THE WITNESS: Well, he wasn't.

17 BY MS. DELGADO:

18 Q. But he was at one point hired, correct?

19 A. Right. But you would have had to go
20 through a background check.

21 Q. Let me ask you about one more person, a
22 Sebastian Gorka. He was special assistant to the
23 President; is that right?

24 A. I think that's right.

25 Q. And he left in August 2017; does that



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1 ring a bell?

2 **A.** Rings a bell.

3 **Q.** And he also -- tell me if this rings a
4 bell -- had only temporary security clearance,
5 right?

6 **A.** I don't know.

7 **Q.** No.

8 Would it be correct to say or do you
9 have any reason to believe this is inaccurate, that
10 everyone from the comms group, just as you said,
11 would happen allegedly on that plane ride with
12 Mr. Miller, did go into the White House?

13 **A.** I don't know, because I don't know who
14 everyone was in the comms group.

15 **Q.** I could spell out some names. Jessica
16 Ditto, did she go in?

17 **A.** Yes.

18 **Q.** Steven Cheung?

19 **A.** Yes.

20 **Q.** Cliff Sims?

21 **A.** Yes.

22 **Q.** Haylan Dore (phonetic) ?

23 **A.** I don't know.

24 **Q.** Kelly Love?

25 **A.** I don't know.



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1 **Q.** Alexa Henning?

2 **A.** I believe so. I'm not a hundred
3 percent, but I believe -- no, she did. I don't
4 know if it was right away or later.

5 **Q.** Lindsay Walters?

6 **A.** Yes.

7 **Q.** Yes, to all of them.

8 **A.** But she was a RNC person, I believe.

9 **Q.** Yeah, you may be right. I think she
10 joined -- yeah, transitioned at the end there. It
11 was...

12 And there's Andrew also, but I forgot
13 the last name, so I will not ask you about that.
14 Let me see here. I think I'm just going through my
15 notes before I let you go, if there's anything
16 else.

17 Do you remember a Cassidy who worked for
18 David Bossie in the campaign?

19 **A.** Yes.

20 **Q.** And do you remember, she did -- she was
21 his administrative assistant who did our building
22 security IDs? Does that ring a bell? Probably not
23 since you weren't at the campaign.

24 **A.** No, I remember Cassidy working for Jared
25 outside of Jared's office.

1 **Q.** Uh-hmm.

2 **A.** Maybe I'm not thinking of the right
3 person. I think she worked for Jared.

4 **Q.** And what were the qualifications there?

5 **A.** I don't know. You'd have to ask Jared.

6 **Q.** There's one more article, and I can send
7 it to you or we can speed things up and I can just
8 tell you, it's a *New York Times* article from
9 July 21st, 2017. And if I may quote from it, it's
10 about Sean Spicer's resignation and it mentions
11 you, so I wanted to ask you about that.

12 It says, "The resignation is a blow to
13 the embattled White House Chief of Staff, Reince
14 Priebus, the former RNC chairman who brought
15 Mr. Spicer into the West Wing despite skepticism
16 from Mr. Trump, who initially questioned his
17 loyalty."

18 Do you remember that *New York Times*
19 article?

20 **A.** No.

21 **Q.** Does that sound --

22 MR. BLUMETTI: Could you just give us --
23 I'm sorry. I just wanted to know the name of
24 the headline and the date again.

25 MS. DELGADO: Sure. Let me bring you



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1 the -- let me just open it here. I won't send
2 it, so it doesn't slow things down, but I'll
3 just open the link. It is "Sean Spicer resigns
4 as White House Press Secretary," and it's by
5 Glenn Thrush and Maggie Haberman, and it's
6 July 21st, 2017.

7 MR. BLUMETTI: Thank you.

8

9 BY MS. DELGADO:

10 **Q.** Do you recall Mr. Trump expressing any
11 concern about Mr. Spicer's loyalty?

12 **A.** No.

13 **Q.** Did you correct that article, or...

14 **A.** I didn't read it.

15 **Q.** You didn't read it.

16 So Mr. Trump never questioned
17 Mr. Spicer's loyalty?

18 **A.** You'd have to ask him. I don't recall
19 him questioning his loyalty.

20 What did the article say?

21 **Q.** I'll read it again. No problem.

22 "Mr. Spicer's resignation is a blow to
23 the embattled White House Chief of Staff, Reince
24 Priebus, the former RNC chairman who brought
25 Mr. Spicer into the West Wing despite skepticism

1 from Mr. Trump who initially questioned his
2 loyalty."

3 **A.** No. The President chose Sean among many
4 people that wanted the job of press secretary.

5 **Q.** Why do you think those reporters -- do
6 you have any idea why they would have had that
7 belief enough to print it?

8 **A.** I don't know. Maybe someone said that
9 to them. I don't know.

10 **Q.** Was Sean a big proponent of the
11 President prior to the win?

12 **A.** I think Sean was very -- very much
13 onboard with President Trump prior to the win and
14 spent a lot of time in Trump Tower, working there
15 once or twice a week while then coming back to the
16 RNC a few days a week as well.

17 **Q.** Okay. And I just have one more article
18 I want to reference here. Give me one minute. I'm
19 almost done.

20 Okay. Earlier we were speaking about --
21 you asked what the date of that mugshot was
22 regarding Boris, that mugshot and the smoking gun,
23 and it was March --

24 **A.** I don't think I asked about it, but you
25 can tell me about.

1 Q. Oh, okay. Fair enough.

2 I think we went back and forth about the
3 date on it, and it was March 2017. But I wanted to
4 show you --

5 MS. DELGADO: And Mr. Blumetti, the
6 article's title is "The obscure lawyer who
7 became Donald Trump's TV attack guy," and it's
8 *New York Times* October 13th, 2016.

9 BY MS. DELGADO:

10 Q. So this is pre-joining the White House,
11 and this article does state, "Two years ago Mr.
12 Epshteyn was charged with misdemeanor assault in
13 Scottsdale, Arizona after a bar fight."

14 So this was in the public domain,
15 Mr. Priebus, several weeks -- about two months
16 before Mr. Epshteyn joined the White House.

17 Did you have any concern about that --

18 MR. BLUMETTI: Objection.

19 BY MS. DELGADO:

20 Q. -- the criminal record of someone
21 serving as a special assistant to the President?

22 A. Sure, I do, but that's what the vetting
23 is all about.

24 Q. Fair enough. Fair enough.

25 Okay. I think I'm pretty much done. I

1 mean, your counsel has an opportunity now to ask
2 you any questions, but I think I have what I need.

3 MR. BLUMETTI: I don't have any
4 questions.

5 MS. DELGADO: Okay. Give me 30 seconds
6 to see here. I think we're -- I think that that
7 will be it.

8 Did you want to opt to read?

9 MR. BLUMETTI: Yes.

10 MS. DELGADO: Okay. Then I guess that
11 concludes. Mr. Priebus, thank you. I know this
12 deposition was scheduled and rescheduled and
13 rescheduled several times, so thank you for
14 appearing and for answering my questions.

15 THE WITNESS: Thank you. No problem.

16 MS. DELGADO: Okay. Have a good
17 afternoon.

18 THE WITNESS: All right. You too.

19 (Thereupon, the deposition was
20 concluded at 2:05 p.m.)

21

22

23

24

25



1 CERTIFICATE OF OATH
2

3 STATE OF FLORIDA)
4 COUNTY OF MIAMI-DADE)

5
6
7 I, the undersigned authority, certify
8 that REINCE PRIEBUS personally appeared before me
9 and was duly sworn.

10 WITNESS my hand and official seal this
11 February 21, 2024.

12
13
14
Elena Robaina

16 ELENA ROBAINA, FPR
17 Notary Public-State of Florida



19
20
21 My Commission Expires: 4/17/2024
22 My Commission #: GG971350
23
24
25



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2 STATE OF FLORIDA)
3) SS.
COUNTY OF MIAMI-DADE)

5 I, Elena Robaina, Florida Professional
6 Shorthand Reporter, do hereby certify that I was
7 authorized to and did stenographically report the
8 deposition of REINCE PRIEBUS; and that the
9 foregoing transcript, pages 1 through 161, is a
10 true record of my stenographic notes.

11 I further certify that the said witness was
12 duly sworn according to law.

13 I further certify that I am not of counsel
14 to either of the parties to set cause or otherwise
15 interested in the action.

16 In witness whereof, I here unto set my hand
17 and affix my official seal this
18 February 21, 2024.

20 *Elena Robaina*
21

22 _____
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) SS.
COUNTY OF DADE)

I, hereby certify that I have read the foregoing transcript pages 1 to 156 and find the same to be true and accurate.

9 Any corrections made by me are set forth
10 on the errata page attached hereto.

REINCE PRIEBUS

17 | Sworn to and subscribed before me on this,

Notary Public

My Commission expires:

My Commission #:

1 ERRATA SHEET
2

3 I, REINCE PRIEBUS, do hereby acknowledge
4 that I have read this transcript and find it to be
5 accurate except for the corrections noted below.

6
7 PAGE ____ LINE ____ / _____
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17

18

19

REINCE PRIEBUS

20

21

Signed and dated this ____ day of 2024.

22

23

24

25





4 TO: REINCE PRIEBUS
5 c/o Jared Blumetti, Esq.
6 JBlumetti@LHRGB.com

7 February 21, 2024

8 IN RE: ARLENE DELGADO v. DONALD J. TRUMP FOR
9 PRESIDENT, et al
CASE NO: 19-cv-17764 (AT) (KHP)

10 Dear REINCE PRIEBUS,
11 With reference to the examination of YOURSELF,
12 deponent in the above-styled cause, taken on
13 02/08/2024 under oath, please be advised that the
transcript of the Deposition has been transcribed
and is awaiting your signature.

14 Please arrange to conclude this matter at your
earliest convenience. We would suggest that you or
15 your attorney's office telephone this office and
arrange an appointment suitable for all concerned.

16 However, if this has not been taken care of by
17 March 22nd, 2024, we shall conclude the reading and
signing of said deposition has been waived, and
18 shall then proceed to file the original of the said
transcript with the party who took the deposition,
without further notice to any parties.

19 Sincerely,

20 
21 ELENA ROBAINA, FPR

22
23 cc: All Counsel of Record.

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